



**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

**Page 2**

1 STATE OF GEORGIA

2 COUNTY OF COBB

3 VIDEOTAPED DEPOSITION OF LILY ENGLEMAN

4

5 Pursuant to Article 8.B of the RULES AND  
6 REGULATIONS OF THE BOARD OF COURT REPORTING OF THE  
7 JUDICIAL COUNCIL OF GEORGIA, I make the following  
8 disclosure:

9 I am a Georgia Certified Court Reporter.  
10 I am here as a representative of Huseby Global  
11 Litigation.

12 Huseby Global Litigation was contacted by  
13 the offices of SATCHER & MCGOVERN, LLC, to provide  
14 court reporting services for this deposition. Huseby  
15 Global Litigation will not be taking this deposition  
16 by O.C.G.A. 15-14-37 (a) and (b).

17

18

19

20

21

22

23

24

25

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

**Page 3**

1 ON BEHALF OF THE PLAINTIFF:

2 MARK BEGNAUD  
3 Attorney-at-Law  
4 Eshman Begnaud, LLC  
5 315 West Ponce de Leon Avenue  
6 Suite 775  
7 Decatur, Georgia 30030  
8 Mbegnaud@eshmanbegnaud.com

6 ON BEHALF OF THE DEFENDANT, NATHAN ADKERSON:

7 ANNARITA L. MCGOVERN  
8 Attorney-at-Law  
9 Satcher & McGovern, LLC  
10 288 South Main Street  
11 Suite 100  
12 Alpharetta, Georgia 30009  
13 Amcgovern@satcherhermcgovernlaw.com

11 ON BEHALF OF THE DEFENDANT, JOSE MORALES:

12 ERIC BALLINGER - videoconference  
13 Attorney-at-Law  
14 Royal Will  
15 4799 Sugarloaf Parkway  
16 Building J  
17 Lawrenceville, Georgia 30044  
18 Dwill@royallaw.net

16 ON BEHALF OF THE DEFENDANT, TOMEIKA JORDAN:

17 DERRICK L. BINGHAM - videoconference  
18 Attorney-at-Law  
19 Stites & Harbison, PLLC  
20 303 Peachtree Street, N.E.  
21 Suite 2800  
22 Atlanta, Georgia 30308  
23 Debingham@stites.com

21 ON BEHALF OF THE DEFENDANT, MARYJANE MOSS:

22 NOAH GREEN - videoconference  
23 Attorney-at-Law  
24 Appelbaum Henefeld & Green, P.C.  
25 3017 Bolling Way, N.E.  
Suite 129  
Atlanta, Georgia 30305  
Ng@aps-law.com

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 4**

1 ON BEHALF OF THE DEFENDANTS WILLIAM CLAYTON NIX  
AND JOHN RICHEY:

2

CHARLES E. COX, JR.  
Attorney-at-Law  
Charles E. Cox, Jr., LLC  
Post Office Box 67  
Macon, Georgia 31202-0067  
Charles@cecoxjr.com

6 ON BEHALF OF THE DEFENDANT, JONATHAN ADAMS:

ERIC O'BRIEN - videoconference  
Attorney-at-Law  
Buckley Christopher, P.C.  
2970 Clairmont Road, N.E.  
Suite 650  
Atlanta, Georgia 30329  
Tbuckley@bchlawpc.com

11 ON BEHALF OF THE DEFENDANT, MIKE RILEY:

CHARLES J. COLE  
Attorney-at-Law  
Mcrae Bertschi & Cole LLC  
1872 Independence Square  
Suite D  
Dunwoody, Georgia 30338  
Cjc@mcraebertschi.com

16

17

18

19

20

21

22

23

24

25

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

**Page 5**

1

2

- - -

3

Videotaped deposition of LILY

4

ENGLEMAN, taken by the Defendants, at 315

5

W. Ponce de Leon Avenue, Suite 800,

6

Decatur, Georgia 30030, on the 14th day of

7

February 2023, at 10:00 a.m., before Lynne

8

C. Fulwood, Certified Court Reporter.

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

Page 6

1	INDEX TO EXHIBITS		
2	Exhibit 1	Videotape (retained by Counsel)	122
3	Exhibit 2	JPay	122
4	INDEX TO EXAMINATION		
5	Examination by Ms. McGovern		8
6	Examination by Mr. Cole		151
7	Examination by Mr. Cox		156
8	Examination by Mr. Green		163
9	Examination by Mr. O'Brien		166
10	Examination by Mr. Bingham		173
11	Examination by Mr. Ballinger		176
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

**Page 7**

1 P R O C E E D I N G S

2 - - -

3 (Whereupon, the video camera was  
4 turned on.)

5 THE VIDEOGRAPHER: This is the  
6 beginning of Media 1, in the deposition of  
7 Lily Engleman, in the matter of Lily  
8 Engleman versus Nathan Adkerson, et al.  
9 Today's date is February 14th, 2023. The  
10 time is 10:21 a.m.

11 If the attorneys present would please  
12 introduce themselves for the record, after  
13 which the Court Reporter will swear in the  
14 witness.

15 MR. BEGNAUD: Representing Plaintiff  
16 Lily Engleman, I'm Mark Begnaud.

17 MS. MCGOVERN: Annarita McGovern for  
18 Nathan Adkerson.

19 MR. COX: Charles Cox for Mr. Nix and  
20 Mr. Richey.

21 MR. COLE: Chuck Cole for Mike Riley.

22 MR. BALLINGER: Eric Ballinger filling  
23 in for David Will representing Jose  
24 Morales.

25 MR. GREEN: Noah Green for Maryjane

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 8**

1 Moss.

2 MR. BINGHAM: Gary Bingham for Tomeika  
3 Jordan.

4 MR. O'BRIEN: And Eric O'Brien for  
5 Jonathan Adams.

6 LILY ENGLEMAN,  
7 having first been duly sworn, was deposed and  
8 examined as follows:

9 EXAMINATION

10 BY MS. MCGOVERN:

11 Q Good morning, Ms. Engleman.

12 A Good morning.

13 Q My name is Annarita McGovern, and we just  
14 met.

15 I wanted to touch base with you before we  
16 begin to see if you'd been previously deposed before.

17 A No.

18 Q Okay. Couple of basic ground rules. We  
19 obviously have a court reporter and a videographer.  
20 We tend to nod and gesture, and I know I have a habit  
21 of interrupting. And if we can both try to speak one  
22 at a time and not do any gestures so that we can have  
23 a clean transcript.

24 If you need a break for any reason, let  
25 me know. I just ask that you answer the question on



**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

**Page 9**

1 the table before taking the break.

2 If you don't understand a question that I  
3 ask for any reason, please let me know, and I'll  
4 restate it. Because if you answer, it will be taken  
5 down as if you understood and answered accordingly.

6 A Okay.

7 Q All that makes sense?

8 A Yeah.

9 Q Okay.

10 MS. MCGOVERN: And I'm assuming we're  
11 going to do the same stipulations and  
12 reserve objections except as to form and  
13 responsiveness?

14 MR. BEGNAUD: Yes, ma'am.

15 MS. MCGOVERN: Okay.

16 BY MS. MCGOVERN:

17 Q Can you please state your full name for  
18 the record?

19 A Lily Eugenia Engleman.

20 Q What is your date of birth?

21 A September 5th, 1988.

22 Q And what is your current address?

23 A 1445 Juneau Court, Tucker, Georgia 30084.

24 But I am moving on Saturday, so that won't be my  
25 address for very long.

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 10**

1           Q     Okay. What's your new address on  
2     Saturday?

3           A     I think it's 2985 First Avenue,  
4     Southwest, Atlanta, Georgia 30315.

5           Q     Okay. And is that a house, apartment --

6           A     It's a house.

7           Q     -- condo?

8           A     It's a house.

9           Q     Okay. And buying or renting?

10          A     Yep. I close on Thursday.

11          Q     Okay. And your current address, is that  
12     a house?

13          A     It's a house.

14          Q     And you own that?

15          A     A friend of mine owns it, and I've been  
16     renting from her.

17          Q     Okay. And how long have you been at your  
18     current address?

19          A     We moved October of 2020.

20          Q     Okay. All right. And so where did you  
21     live prior to 2020?

22          A     Before that, I lived in an apartment at  
23     924 Brookhaven Way, Brookhaven, Georgia 30319.

24          Q     Okay. And how many years have you lived  
25     in the Atlanta area?

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 11**

1           A       Since 2015.

2           Q       Okay. And do you have family members  
3 that live in the -- in the Atlanta area generally?

4           A       Yes. So both of my parents live in  
5 Dahlonga. I don't know if that counts as the  
6 Atlanta area, but they're in Dahlonga. My sister --  
7 I have a younger sister who's kind of in, like,  
8 Kennesaw-Woodstock. And I have an older brother  
9 who's in Peachtree Corners.

10          Q       And what are the names of your parents?

11          A       Dennis and Deborah Engleman.

12          Q       Sister, what's her name?

13          A       Mary Victoria Engleman.

14          Q       Okay. And your brother, what's his name?

15          A       John Nicholas Engleman.

16          Q       And we say this for jury selection. It's  
17 not --

18          A       Yeah.

19          Q       -- to get into your personal business.

20                   Any other family that you have including  
21 cousins, aunts, uncles or anything in the Atlanta  
22 area?

23          A       No.

24          Q       Okay. You're not married?

25          A       No.

LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Page 12

1 Q And no children?

2 A No.

3 Q Okay. Any prior legal actions you've  
4 been involved with in your life as a plaintiff or as  
5 a defendant?

6 A No.

7 Q Okay. This is your first lawsuit?

8 A Yes.

9 Q Okay. And I ask everyone this. It's  
10 not -- not to indicate anything.

11 Have you ever been arrested for any  
12 reason?

13 A No.

14 Q Okay. Nothing but any minor traffic  
15 citations in your life?

16 A Correct.

17 Q Okay. And tell me about -- oh, what was  
18 your cell phone number at the time of the arrest and  
19 the visit that we're here on today?

20 A It's the same number that I've -- I still  
21 have. It's (706) 200-2062.

22 Q Have you taken any -- first of all, do  
23 you take any medications?

24 A I take oral contraceptives.

25 Q Okay. And so have -- you haven't taken

1 any medications today that would impair your ability  
2 to testify truthfully?

3 A No.

4 Q Okay. And any other medical issues,  
5 illness, lack of sleep or anything else that would  
6 impair your ability to understand the questions and  
7 answer them truthfully?

8 A No.

9 Q Okay. And any -- what is your  
10 educational background? If you can kind of start  
11 from high school and work me on up.

12 A Okay. So I graduated from high school,  
13 Lumpkin County High School. It's in Dahlonega. That  
14 was in 2006. My senior year, I did joint enrollment  
15 at North Georgia University, also in Dahlonega. So I  
16 was there my senior year of high school and my  
17 freshman year of college.

18 After my freshman year of college, I  
19 transferred to Georgia College and State University  
20 in Milledgeville where I received my bachelor's of  
21 arts degree. I doubled majored in criminal justice  
22 and English literature, and I minored in business  
23 management. I graduated from there in December of  
24 2010.

25 And then I went back to school at Georgia

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 14**

1 State University, fall of 2015, to get my master's in  
2 social work, and I graduated in May of 2017.

3 Q Okay. And were you working while you  
4 were doing the Georgia State program or the --

5 A The social work program?

6 Q Yes.

7 A I was, yes. So I -- I worked part time  
8 at a restaurant, as a server at a restaurant. I also  
9 had a graduate research assistant position with a  
10 professor at the school of social work. So I did,  
11 you know, research with her and kind of different  
12 odds and ends. And that paid for a lot of my tuition  
13 plus gave me, like, a monthly stipend.

14 Q So -- and what restaurant were you  
15 working part time at?

16 A The Wing Factory.

17 Q Okay.

18 A A sports bar in Buckhead.

19 Q Okay. And were you taking classes full  
20 time or part time?

21 A Full time.

22 Q Okay. And any other educational work  
23 after your MS- -- MSW from Georgia State?

24 A I mean, I have to do continuing  
25 education.

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 15**

1           Q     **Sure.**

2           A     But nothing like at a university, no.

3           Q     **Okay. Any other licenses or**  
4     **certifications?**

5           A     I have my -- I currently have my clinical  
6     social work licensure that I just received in  
7     January. Prior to that, I had a lower level social  
8     work licensure that I received right after  
9     graduating.

10          Q     **Explain the difference between the two**  
11     **licensures.**

12          A     Okay. So the first one is a licensed  
13     master social worker. It's a licensure that you can  
14     get once you get your master's degree in social work.  
15     And beyond that, there aren't a lot of requirements.  
16     You need, like, recommendation letters, whatever.  
17     But you can immediately get it, and, you know,  
18     it's -- it's a lower level licensure that does not  
19     allow you to do clinical work, which is, you know,  
20     like therapy, essentially.

21                 And then a clinical social work  
22     licensure, you can get after you have done supervised  
23     clinical work for at least two years and you have  
24     like 120 supervision hours and all of this kind of  
25     stuff. So usually, you know, you're not eligible to

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 16**

1 get it until a few years after you get your master's  
2 degree. So I just received that in January.

3 Q In order to get that licensure, do you  
4 have to take any tests or additional coursework?

5 A Yes. Yes, there's tests for both of  
6 them.

7 Q Okay.

8 A Uh-huh.

9 Q And then during what period of time did  
10 you do your supervision for those subsequent license?

11 A I did my supervision when I was with the  
12 capital defenders office.

13 Q Okay.

14 A And so a new director is mitigation  
15 there. She is a clinic social worker, and so she was  
16 able to provide me with supervision. There was  
17 another clinical social worker on staff who I also  
18 did supervision with. And then, of course, when I --  
19 my employment ended, I could not continue that with  
20 them.

21 So about, I think, November of 2021, a  
22 friend of mine connected me with a -- like a paid --  
23 you can -- you can either get supervision through  
24 your employment if they offer it for free, or you  
25 can, you know, hire someone, essentially. And there



**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 17**

1 are a lot of people, social workers, that kind of do  
2 that as a side hustle. So I did supervision for  
3 about a year with her. Her name is Jamie Bray.

4 **Q Jamie Bray.**

5 **How do you spell that? B-R- --**

6 A B-R-A-Y.

7 **Q And where is she in practice?**

8 A I think she lives in Athens. She's a  
9 professor, social work professor at UGA, so I think  
10 she works in Athens.

11 **Q And so the supervision was received in**  
12 **Athens?**

13 A No. So it was done over the phone. So  
14 we would have hourly phone sessions. And then we  
15 also did group supervision via Zoom.

16 **Q Like Telehealth?**

17 A Yeah, essentially so. Uh-huh.

18 **Q Okay. And she would supervise you during**  
19 **your telehealth?**

20 A Well, I wasn't doing telehealth. It was  
21 like the group supervision would be me and maybe five  
22 other supervisees.

23 **Q Okay.**

24 A So she had like, I don't know, 15  
25 different people that she was supervising. And we

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 18**

1 would get together, you know, via Zoom and talk about  
2 different cases that we were working, talk about  
3 different, you know, issues that we were having. You  
4 know, I have a client that's presenting this way,  
5 what do you-all think about that and -- yeah.

6 **Q Okay. And so how many hours do you do**  
7 **with Ms. Bray, approximately?**

8 **A** I -- I think when I left the capital  
9 defenders office, I had to have 120 total.

10 **Q Right.**

11 **A** When I left the capital defenders office,  
12 I had roughly half of that. I think it was maybe  
13 around 52 or 54.

14 **Q Okay.**

15 **A** So I did the remainder with Ms. Bray.

16 **Q Okay. So about half?**

17 **A** Yeah.

18 **Q And then when did you receive the**  
19 **subsequent licensure?**

20 **A** I think I took the test January 4th and  
21 passed and then, you know, was immediately --

22 **Q Of this year, '23?**

23 **A** Yeah. Yes, last month.

24 **Q Okay. And you passed it, and you found**  
25 **out and got the licensure when?**

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

Page 19

1           A       I mean, you find out that day --

2           Q       Okay.

3           A       -- that you passed.

4           Q       All right. Okay. So this happened.  
5       **Congratulations.**

6           A       Yeah.

7           Q       Okay. And so what does the new  
8       **certification allow you to do then?**

9           A       I'm sorry, Mark. The new certification  
10       allows me to practice clinical social work. So if I  
11       wanted to open my own therapy business, I could do  
12       that. If I wanted to, you know, partner with another  
13       therapist and kind of have a -- you know, a private  
14       practice together, we could do that.

15                   I don't want to do that. I'm not  
16       interested in being a private therapist. I've never  
17       been interested in that. But I -- I want to have  
18       just the highest level of credentials possible in my  
19       field just for my own kind of sense of professional  
20       credibility. I wanted just the training and the  
21       supervision that went along with getting that  
22       licensure because it helps me do my job better, you  
23       know, whatever my job is.

24                   So it's -- being a clinical social worker  
25       is kind of -- it's similar to being a licensed

1 psychologist, except a licensed psychologist can do  
2 psychological testing that social workers can't --  
3 will never be able to do.

4 Q So you have a larger variety of options  
5 available to you in your employment as a result of  
6 the --

7 A That's right.

8 Q -- the (inaudible) license, right?

9 A Yes.

10 Q Than you did back in --

11 A For sure.

12 Q -- 2019 or '20?

13 A Yes.

14 Q Okay. All right. And so have you done  
15 any other subsequent training or -- or licensure  
16 work?

17 A No.

18 Q Okay. Other than your continuing  
19 education?

20 A Right.

21 Q All right. And your license is in good  
22 standing?

23 A Yes.

24 Q And your prior license is also in good  
25 standing?

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 21**

1           A     It doesn't -- it -- the clinical  
2     licensure supercedes it, so it's --

3           Q     **So it doesn't really matter?**

4           A     It doesn't matter. It's not in good  
5     standing.

6           Q     **Okay. All right. But you were never**  
7     **suspended or had any ramifications on your license**  
8     **previously?**

9           A     Well, when I was arrested, I was not able  
10    to renew.

11          Q     **Okay.**

12          A     You have to renew your licensure every  
13    two years in Georgia. And renewal year was -- it's  
14    always on even years. So it was like September of  
15    2020. And I went to renew, and there were -- you  
16    have to indicate if you've been arrested within the  
17    last year or, you know, anything like that. And I  
18    indicated that I had been arrested.

19                They wanted me to send in, you know, the  
20    physician documents and all of that, which I didn't  
21    have at that point. You know, I'd been arrested, but  
22    nothing has gone on with my criminal case whatsoever.  
23    I was not even indicted yet. And so I couldn't give  
24    them anything.

25                And so the licensure -- it was placed in

1     this, like, not -- it wasn't, like, cancelled. They  
2     placed it in this, like, "cannot renew at the moment  
3     type" status. And it was like that for, I think -- I  
4     think I finally was able to give them some  
5     documentation that they accepted maybe in the spring  
6     of 2021. And then they did put it in active status  
7     again.

8           Q     So how long were you in inactive status?

9           A     Maybe six months.

10          Q     Okay.

11          A     I think so.

12          Q     Okay. And did you provide them any  
13     supplemental information following your arrest,  
14     whether it was just in a personal written narrative  
15     or anything --

16          A     I gave them a --

17          Q     -- like that?

18          A     I gave them a letter. I wrote them a  
19     letter in the spring of 2021. At that point, I had  
20     been fired. I lost my job. You know, my licensure,  
21     if you looked it up, it showed that it had not been  
22     renewed. That was a barrier to employment. I wrote  
23     them a letter explaining what had happened,  
24     explaining why I didn't have any documentation. And,  
25     you know, showed them that once I did have

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 23**

1 documentation, I would give it to them. And they  
2 said, Okay, you know, you haven't been convicted.  
3 You know, we understand that. We'll place this in  
4 active status again, and then once you get  
5 documentation, send it in.

6 Q Okay. All right. And so in terms of  
7 other types of training, you've never had any, like,  
8 post training like correctional officers would have,  
9 correct?

10 A Oh, no. No.

11 Q Any legal training that you've ever had?  
12 I mean, I know that you work with the --

13 A Yeah.

14 Q -- defenders office, so -- but any formal  
15 -- let's start with any formal training classes,  
16 courses, anything more along those lines.

17 A In legal studies?

18 Q Yes.

19 A No. I mean, I have a -- I mean, I attend  
20 the same kinds of conferences that attorneys in my  
21 office attend. But there's not like -- I mean, I'm  
22 not a lawyer.

23 Q Right.

24 A So no.

25 Q Right.

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 24**

1                   So no -- no paralegal training, no --

2           A       No.

3           Q       -- formal legal training?

4           A       No.

5           Q       Just stuff that you would do through  
6 work?

7           A       Yes.

8           Q       Okay. And no weapons training?

9           A       No.

10          Q       Okay. Tell me about your employment  
11 history. And I guess it would probably be easier if  
12 we start where you're working now and work our way  
13 back.

14          A       Okay. So I currently work with the  
15 federal defender program of the Northern District of  
16 Georgia. I've been there since January 18th of 2022.  
17 So just about a year.

18          Q       Is that a similar position to what you  
19 had with the state defender program?

20          A       It's very similar, yes. I'm a mitigation  
21 specialist. The biggest difference is that I'm not  
22 doing capital work. It's non-capital cases, whereas,  
23 of course, at the capital defenders office, was  
24 solely capital work.

25          Q       And was that out of choice, or they



1     **didn't have an opening, or how did that occur?**

2           A     They don't do capital cases. I mean,  
3     they have -- they have a capital habeas unit. It's  
4     very, very small. You know, it's -- they just need  
5     one mitigation specialist that's fully staffed.  
6     Yeah, so the trial unit doesn't do capital cases.

7           Q     Okay. And are you appearing in most  
8     courts in the Northern District of Georgia in terms  
9     of your work? Are you providing testimony?

10          A     I don't provide testimony, but yes, we're  
11     in -- I do cases for all the judges, if that's what  
12     you're asking.

13          Q     Yeah, that's what I was kind of getting  
14     to.

15                   Have you been before most of the judges  
16     in the Northern District or been familiar or  
17     submitted information on cases for --

18          A     Yeah.

19          Q     -- most of the judges?

20          A     Yes. Yes.

21          Q     Any that you deal with more often than  
22     not?

23          A     It's really just random. So what happens  
24     is if an attorney at my office has a case that they  
25     think mitigation work would be very useful on, if

1 they have a case in which they have already kind of  
2 identified or believe that their client has mental  
3 health issues, maybe has substance abuse issues that  
4 are, you know, relevant to the crime that happened.  
5 Maybe they think their client has a long history of  
6 trauma or something. You know, maybe their client is  
7 just kind of acting bizarrely and they don't know why  
8 and they want someone with some training in that to  
9 kind of help figure out what's going on, they'll ask  
10 me to work on their case.

11 And there's one other full-time  
12 mitigation specialist as well, so we kind of take  
13 cases on a rotating basis. If we're very full, you  
14 know, we have very full caseloads, we'll tell  
15 attorneys we can't really handle it right now, maybe  
16 try to get a continuance, we can maybe look at it in  
17 a couple of months or something. So it's just very  
18 random as to what attorney wants us and for what case  
19 and what judge they happen to have.

20 Q Okay. Who do you work directly for?

21 Who's your direct supervisor?

22 A Stephanie Kearns is the director of the  
23 agency.

24 Q Her --

25 A K-E-A-R-N-S.

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 27**

1           Q     Thank you.

2                     And has that gone well?  No negative --

3           A     Uh-huh.

4           Q     -- issues with the -- with the job,  
5     negative feedback or anything like --

6           A     It's been great.

7           Q     Okay.

8           A     It's been great.

9           Q     All right.  And so prior to working at  
10    the federal defenders office, where did you work?

11          A     Prior to that, I -- in May of 2021, I  
12    opened my own LLC, like a mitigation advocacy, LLC.  
13    That's still active.  I still have one case left over  
14    from like a year ago that I -- is still kind of a  
15    little bit active.  So the LLC is still active.

16                So I -- I mostly contracted with CJA  
17    panel attorneys for that.  I did do some other things  
18    as well.  But I had that from -- I opened that in  
19    May 2021, if I remember correctly.  And then, you  
20    know, was doing that until I got the full-time job at  
21    the federal defenders office --

22          Q     What was --

23          A     -- in January 2022.

24          Q     What was the name of the LLC?

25          A     The Whole Story Mitigation Advocacy.

1           Q     And you operated as an LLC, but you were  
2     the sole --

3           A     Yes.

4           Q     -- owner?

5                     And so you received, like, 1099s from --

6           A     Yes.

7           Q     -- the state defender program or who --

8           A     From -- it's from the federal government.

9           Q     From the federal?

10          A     Yes, because I was -- I was working with  
11     CJA panel attorneys, and so it was coming from the  
12     federal government. And then I -- I did do some  
13     contract work with other full-time private mitigation  
14     specialists who were doing capital cases who needed  
15     additional help. And I did a lot of work with a  
16     forensic psychiatrist who does a lot of capital cases  
17     who wanted help with record review and such like  
18     that. And yes, I received 1099s from them.

19          Q     All right. And who is the forensic  
20     psychiatrist you worked with?

21          A     Why am I blanking? Shawn -- I'm blanking  
22     on his last name.

23          Q     You would have a 1099 from him, though?

24          A     Yes.

25          Q     Okay. And I don't think we've seen those

1 yet. If you could provide 1099s, I don't think we've  
2 seen the tax returns either for the relevant time  
3 period. You can follow up with that after the depo  
4 too, so we can get it from that.

5 A Sure. Okay.

6 Q And so any other major clients you have  
7 through your LLC?

8 A No, that was mostly it. The CJA work and  
9 I worked with a mitigation specialist out of Florida  
10 a lot. I worked with -- her name was Lisa Sullivan.  
11 I worked with a psychiatrist a lot. There was  
12 another mitigation specialist here in Georgia that I  
13 worked with some, but it was, like, very small  
14 amount, like, I think I did one -- I worked on one  
15 case briefly with her.

16 Q Did you file a return for the LLC?

17 A Uh-huh.

18 Q Okay. And --

19 A I should say it out loud. Yes.

20 Q Okay. And do you recall about what your  
21 earnings were?

22 A Not from the LLC itself. I know that for  
23 that year of 2021, I think I earned 37,000. So prior  
24 in the year, I was also working at the Wing Factory,  
25 that restaurant.

1 Q Right.

2 Before we get there, what was your hourly  
3 rate that you charged, or did it vary for your LLC?

4 A It was 75 -- 75 an hour for the CJA work.  
5 The work I was doing with the psychiatrist and the  
6 other mitigation specialist, I think, was 35 or 40 an  
7 hour.

8 Q And about how many hours over that  
9 timeframe from May 2021 to getting -- you know, the  
10 end of 2021 do you believe you worked? Were you  
11 working full time?

12 A No. It was definitely not --

13 Q (Inaudible) hours a week?

14 A It was definitely not full time. I would  
15 say on average -- I mean, it was not -- obviously, I  
16 made 37,000. It was hard living. It was probably  
17 ten to 15 hours a week.

18 Q Ten to 15?

19 A I would just guesstimate.

20 Q Okay. But you did file a return for your  
21 LLC, The Whole Story.

22 And who prepared that return for you?

23 A I did.

24 Q You did your own return?

25 A Uh-huh.

1 Q Okay. And the return would tell the  
2 bottom line of what you earned from that business?

3 A Yes.

4 Q Okay.

5 A Yeah, because I received a W-2 from the  
6 restaurant, so you can just --

7 Q Correct.

8 A -- subtract it out.

9 Q Right.

10 A Yeah, see what it was.

11 Q And if you haven't already, can you  
12 please provide that --

13 A Sure.

14 Q -- return information --

15 A Yeah.

16 Q -- to your attorney and (inaudible)?

17 A Yeah.

18 Q Okay. Thanks.

19 And so you were working part time at the  
20 Wing Factory too, right?

21 A Yes.

22 Q And that I'm assuming less than minimum  
23 plus tips, right?

24 A Yes.

25 Q Okay. And what is less than minimum now?

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 32**

1           A       It's 2.13.

2           Q       **Okay.**

3                   MR. BEGNAUD:   Still?

4                   THE WITNESS:   Yeah.   Georgia's been  
5           2.13 for, I don't know, four years.

6   BY MS. MCGOVERN:

7           Q       Back when I did it, but no, you get your  
8   tips on top, so, you know -- but --

9           A       Yeah.

10          Q       Yeah.   No.   I've been there, done that,  
11   so --

12          A       I mean, it was also pandemic time, so --

13          Q       **Okay.**

14          A       You know, it's not -- it was not like  
15   popping restaurant times all the time, you know.

16          Q       **Sure.**

17                   So why did you choose to go back there?  
18   I know you had an ongoing relationship with that  
19   restaurant.

20          A       Yeah.   Yeah, yeah.   I've been -- I've  
21   been back and forth a few times, which, you know,  
22   it's the same general manager that's been there for a  
23   very, very long time.   And I went back there this  
24   latest time, you know, never expecting to ever work  
25   in a restaurant again, but I went back there in



**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 33**

1 January of 2020, was when I had been arrested. I was  
2 still -- what is the word, on leave -- on  
3 administrative leave --

4 Q Uh-huh.

5 A -- from the capital defenders office. I  
6 was -- I was very depressed. I didn't have a whole  
7 lot to do with my time and in the future felt very  
8 scary.

9 So I thought, Let me see if I can just  
10 work a couple of shifts a week at the restaurant. It  
11 will keep me occupied. It will be healthy  
12 emotionally, bring in a little bit of extra cash, you  
13 know. Who knows what's going to happen to me, and it  
14 would probably be smart to get some extra money.

15 So I started there again, and I -- even  
16 when I came back to the capital defenders office, I  
17 continued working there twice a week, like Sunday and  
18 Monday nights, I think. It was just because at that  
19 point, the extra money was -- it was nice, it was  
20 helping me pay off some credit card debt. And I just  
21 still felt like I have no idea what's happening in my  
22 life, and I want this security blanket.

23 So I continued there, and it was very  
24 helpful because then when I suddenly was terminated,  
25 you know, I went to my manager and was able to say,

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 34**

1 This happened to me. Can you give me more shifts?

2 And, you know, of course, he did.

3 Q So many -- spent many years waiting  
4 tables including as a professional for extra money.  
5 There's a social element that --

6 A Yeah.

7 Q And this is a time during the pandemic --

8 A Right.

9 Q -- and things were very difficult.

10 A Right.

11 Q It was positive benefits to the kind of  
12 social aspect of being in that kind of group.

13 A Yeah, I mean, you know, you're saying  
14 there's enough that you're not able to think about,  
15 you know, the fact that you're under a criminal  
16 prosecution, yeah. And it was a little bit of time  
17 when I did kind of be busy and in a very different  
18 environment and with people that were doing very  
19 different things and -- and it was stress-relieving  
20 to some extent.

21 You know, it was also as time wore on --  
22 you know, especially once I'd been terminated, it was  
23 a sense of I have a master's degree, I'm a licensed  
24 social worker, and I'm working in a restaurant. And  
25 it was -- you know, as time went on, it was very --

1 it was depressing.

2 And so I worked really hard to try to  
3 start the LLC business because I could not -- I  
4 just -- it was -- you know, it -- it served its  
5 purpose, the restaurant work served its purpose, and  
6 then it was, like, I can't -- I can't continue.

7 Q Give me some timeframes in terms of when  
8 you were on administrative leave -- and that was with  
9 pay, right?

10 A Right.

11 Q So what was the timeframe of the  
12 administrative leave?

13 A It started, I mean, the day I was  
14 arrested.

15 Q Right.

16 A Until I think I came back -- it was right  
17 before Valentine's Day, so I think it was like  
18 February 11th, maybe, something like that, of 2020.

19 Q So 2020?

20 A Uh-huh.

21 Q Okay. And so -- and that's when you  
22 were -- you were terminated and there was no more  
23 administrative leave --

24 A No, I was not terminated yet.

25 Q Okay. All right.

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 36**

1           A       Yes.

2           Q       **You were on administrative leave?**

3           A       I was on administrative leave following  
4       the arrest for three months, and then they brought me  
5       back full time.

6           Q       **Okay.**

7           A       And I was back full time until -- I was  
8       back full time at the capital defenders office until  
9       November, mid-November of 2020, when I was taken out  
10      of the capital defenders office -- that was following  
11      the indictment -- taken out of the capital defenders  
12      office, and I was transferred to an agency within the  
13      Georgia Public Defense Council called office of  
14      mental health advocate, a very small agency. They  
15      represent people who are insanity acquittals --  
16      acquittes. There's just like six people there, and  
17      they just kind of transferred me there, I think,  
18      because they didn't know where else to put me. And  
19      they thought, Well, a social worker could help out  
20      this agency for a little bit.

21                   So I was put there in mid-November, and,  
22      you know, I was told, You'll just be here until the  
23      criminal case wraps up, and after that point, you can  
24      decide if you want to go back to the capital  
25      defenders office or if you want to stay here.

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

Page 37

1 But instead, on January 11th of 2021, I  
2 was pulled into a meeting and terminated. So that  
3 was the timeframe of that.

4 **Q What was the explanation for that?**

5 A I was told that there was going -- and  
6 this came from Omotayo Alli, who is the director of  
7 the Georgia Public Defense Council. She told me that  
8 she was implementing a new policy such that anybody  
9 in the agency, in the state agency, who's under  
10 indictment would be terminated. And I said, you  
11 know, We talked two months ago when you moved me to  
12 this other department, and that's not what you told  
13 me then. You said that I could stay at this  
14 department until the criminal case wrapped up, and  
15 then, you know, I could choose where I wanted to go.

16 And she just pretty much said, you know,  
17 Well, it's a new policy they came up with, and that's  
18 just the way it is.

19 **Q Was it with a do not rehire status, or**  
20 **was there a potential --**

21 (Interruption in proceedings.)

22 THE COURT REPORTER: Let's go off the  
23 record.

24 THE VIDEOGRAPHER: The time is  
25 10:51 a.m. We're now off the record.

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

**Page 38**

1 (Whereupon, the video camera was  
2 turned off.)

3 (Whereupon, a brief recess was taken.)

4 (Whereupon, the video camera was  
5 turned on.)

6 THE VIDEOGRAPHER: The time is  
7 10:52 a.m. We're back on the record.

8 BY MS. MCGOVERN:

9 Q Okay. So you're saying there was a new  
10 policy brought on and there was going to be -- anyone  
11 who had an indictment was going to be terminated.

12 And I was asking, was that with a do not  
13 rehire status, or was there potential to be rehired  
14 back?

15 A I did not know at the time. That was not  
16 indicated on the paperwork that I received.

17 Q Okay. Do you know now?

18 A Yes.

19 Q What is it?

20 A Once -- once the charges were eventually  
21 dropped, I asked if I could be rehired back, and I  
22 was told no.

23 Q And were you given a reason why?

24 A No.

25 Q And who did you ask?

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 39**

1           A       So I talked to Jerilyn Bell, who is --  
2       was, at the time, and is the director of the capital  
3       defenders office. She told me she had already heard  
4       that my charges had been dropped. We had this  
5       conversation a couple of days afterwards. She heard  
6       my charges had been dropped. She'd already had a  
7       conversation herself with Omotayo Alli about that and  
8       Omotayo Alli kind of preemptively made the comment  
9       that I wouldn't be hired back, kind of letting  
10      Jerilyn Bell know to not even ask.

11           Q       And do you have an understanding as to  
12      why that was?

13           A       I have no idea.

14           Q       Did you submit a formal application for  
15      the position again?

16           A       No.

17           Q       Did you have any further follow-up with  
18      anyone regarding why they would not rehire you?

19           A       No. No. I mean, that was -- it was a  
20      very (inaudible) conversation with Jerilyn Brill.

21           Q       Did you take any legal action or pursue  
22      the possibility of legal action in regard to your not  
23      getting your job back?

24           A       No.

25           Q       And why is that?

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 40**

1           A       I didn't -- I mean, at that point, I felt  
2   incredibly betrayed, not so much by the capital  
3   defenders office but by the larger Public Defense  
4   Council headed by Omotayo Alli. I felt like she had  
5   lied to me. I felt she had betrayed me. I felt it  
6   would be very unsafe for me to, you know, work under  
7   her again. I really, really loved my job there. And  
8   it was -- and it still is heartbreaking that I was  
9   terminated. And I would love to do capital work  
10  again, and it may be something that I have luck at  
11  revisiting when she's no longer the director.

12           Q       Okay. And specifically other than you  
13  mentioned the policy about -- which was a change of  
14  position, was there anything else about working with  
15  her that created concern and a feeling of not being  
16  safe?

17           A       Well, she was very new. She was -- she  
18  was quite new. She was appointed by Brian Kemp in  
19  the summer of 2020. So I did not have any  
20  interactions with her until I was indicted, and then  
21  she had to be told that an employee, you know, in the  
22  agency was under indictment. And she -- she had a  
23  few conversations with me, like the conversation she  
24  had when she told me she was going to transfer me to  
25  the office of the mental health advocate.



1                   And it just -- I don't know how to  
2 describe it exactly, but she -- I just felt like I  
3 couldn't trust her, like she would tell me things  
4 like we know you didn't do this because they had seen  
5 the discovery. The legal counsel for GPDC had seen  
6 the discovery, and it's obvious that there's not, you  
7 know, anything here. You know, she would look at me,  
8 and she would -- you know, we know that you didn't do  
9 this, and we're going to protect you. And it's very  
10 important to me to protect my agency's paycheck. But  
11 at the same time, she would tell me things like --  
12 she -- she told me essentially that if I told anybody  
13 outside of that room about that conversation that she  
14 was having with me that my job would be in jeopardy.  
15 She -- it was just a very, like, secretive air that  
16 made me very uncomfortable.

17                   She, herself, has a history as a public  
18 defender. She worked as a public defender for many  
19 years, but she made comments about clients to me that  
20 I thought were very inappropriate coming from someone  
21 who worked in public defense. And it -- it made me  
22 question her -- her -- what is the word I'm looking  
23 for? Her actual, like, interest and motivation in  
24 helping indigent clients, like she -- she would say  
25 inappropriate things about them. And it -- I -- I

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 42**

1 just didn't get a really good feeling from her.

2 And so then, when two months later,  
3 she -- you know, she terminated me all of a sudden,  
4 you know, with this concept of like, oh, this is just  
5 a brand-new policy, I've just come up with this  
6 despite what I told you two months ago. You know, I  
7 just got the sense that she was not invested in  
8 indigent defense. I got the sense that she wasn't  
9 really invested in her employees. You know, it's an  
10 appointed -- governor-appointed position. And I got  
11 the sense that it was -- she made decision in that --  
12 in her position as director mostly based on, you  
13 know, maintaining good status with the governor  
14 potentially.

15 Q Is it fair to say that even if you hadn't  
16 been terminated based on your concerns about working  
17 with her, her honesty with you, her comments about  
18 the people in the program, that you may have chosen  
19 to move on regardless?

20 A No, not at all, because I had no  
21 interaction with her prior to that. I just wouldn't  
22 have. She's the director of this whole state agency.  
23 You know, I was a -- I was an employee in one  
24 department within that agency. So throughout my  
25 entire employment, I interacted with the director of

1 the capital defenders office, who I'd always had, you  
2 know, great relations with. Omotayo Alli had -- you  
3 know, the director, not just her but prior directors  
4 had -- you know, they weren't involved in, like, the  
5 day-to-day management of the individual agencies. I  
6 never would have known her, I never would have had,  
7 basically, conversations with her had I not been  
8 under indictment.

9 Q Okay. But is it fair to say you weren't  
10 happy with the direction she was going as the leader  
11 of the agency?

12 A Well, sure, but that's -- that's  
13 government work. I mean, that's -- you know, I  
14 worked in child welfare before. I wasn't happy, you  
15 know, with the director of that agency either. But  
16 that's -- that's state government work. You kind of  
17 just -- you know that they're temporary. You know  
18 that if you care about what you're doing, you'll be  
19 there longer than they are, hopefully, if they're all  
20 government -- you know, governor appointed.

21 Q How has your experience been with the  
22 federal defender program since you've been there  
23 since January?

24 A It's been great.

25 Q Issues politically with the people of any

1 of the same kind of concerns you just expressed?

2 A No. So the federal defender program here  
3 in Atlanta is -- this was a little confusing for me  
4 to understand when I first started working there.  
5 Most federal defender programs are government  
6 agencies. They're agencies within the federal  
7 government. There are a handful throughout the  
8 country that are actually nonprofit. And the one  
9 here for the Northern District of Georgia is actually  
10 nonprofit. So it's grant funded from the federal  
11 government, but it has a board of directors, and it  
12 operates very independently. And I really like that.  
13 After what happened with me with the Public Defense  
14 Council, you know, the idea of working for another  
15 government agency just kind of scared me a little bit  
16 because, again, you have a director, potentially, who  
17 is not really invested in the mission of the agency  
18 that they are -- you know, that they're heading.

19 So I felt a lot more comfortable working  
20 for an agency that was actually a nonprofit, has good  
21 funding. You know, we're not worried about funding  
22 issues like other nonprofits may be, but it has a  
23 board of directors. There's not -- it's not like a  
24 centralized power structure, so I like that.

25 Q It would be fair to say you enjoy your

1 current job?

2 A Yes.

3 Q You intend to stay there for the future?

4 A You know, foreseeable future?

5 Q Yes.

6 A Yeah.

7 Q Okay. And walking back because we kind  
8 of jumped into the capital defender, tell me about  
9 when you started -- so I've got a proper timeline --  
10 when you started employment with the state capital  
11 defender program.

12 A I started there in August of 2017. I  
13 think it was August 2nd.

14 Q And remind me, was that right after you  
15 got your graduate degree?

16 A Yes. I graduated in May of 2017.

17 Q So it was your first job in your  
18 professional capacity as a social worker?

19 A As a social worker.

20 Q Okay. All right. Because I'm not going  
21 to go back there. (Inaudible) before. So -- and  
22 we've talked about the time period through when you  
23 were terminated there.

24 And then what was your specific role and  
25 title at the state capital defender program?

1           A       I think on my paycheck, it says criminal  
2   investigator, but in the office, mitigation  
3   specialist/mitigation investigator. It's used  
4   interchangeably.

5           Q       And for laypeople, if you can walk  
6   through what a mitigation specialist does.

7           A       Uh-huh.

8                   So for capital cases, a mitigation  
9   specialist investigates and comes up with themes and  
10  theories for penalty phase -- for penalty phase of a  
11  capital case because a capital case is kind of in two  
12  different trials, so to speak. You have the  
13  guilt-innocence phase, and then you have a completely  
14  separate trial, so to speak, for penalty phase in  
15  which the jury is deciding whether the person should  
16  have life or the death penalty.

17                   And so the mitigation specialist is  
18  someone who is trained, has to be -- has to be able  
19  to identify, like, mental health issues and has to be  
20  able to identify biopsychosocial issues going on with  
21  the client.

22                   So on a day to day, I would often go out  
23  to a correctional facility to visit my clients. I  
24  would spend a lot of time with their families, their  
25  neighbors, their teachers, their medical providers

1 interviewing them. I would collect records. I would  
2 send out records requests myself and then get the  
3 records back, and I would digest everything into the  
4 case map.

5 And I would identify potential experts  
6 that we felt were needed for the case. You know, if  
7 it was a client that I felt was intellectually  
8 disabled, then we would look at hiring an expert that  
9 could do IQ testing, for example. There was a client  
10 that we thought maybe had a brain injury. We would  
11 like, at hiring, a neuropsych to evaluate that. That  
12 was about the day to day.

13 Q Okay. Were there any guidelines or  
14 policies regarding like what should be done and  
15 shouldn't be done in terms of gathering that  
16 information in your role?

17 A There is, like, the uniform appeal which  
18 kind of governs capital cases. And there are --  
19 like, there are details for what a mitigation  
20 specialist is supposed to do. And I think that --  
21 I'm trying to think how to say this. Within my  
22 agency, there is a mitigation department. So there's  
23 a director of mitigation. She had been working there  
24 for, you know, 12 years or something, I think, at  
25 that time. And there were, within the agency, I

1 don't know, 11 or 12 mitigation specialists on --  
2 that initially kind of reported to her. She would  
3 kind of supervise their work. And there was these,  
4 you know, built out best practices based on, you  
5 know, just the agency lifetime and just knowing how  
6 cases went, what cases were successful, what cases  
7 weren't successful, lessons learned from past  
8 experiences.

9 Q Are those documented best practices?

10 A Yeah. They have documentation. There  
11 are -- the agency has, you know, how to collect  
12 records, you know, how to -- kind of a starter guide  
13 when you're training and you're new of how to conduct  
14 mitigation interviews, how to, you know, make sure  
15 that you're hitting these kind of things. You know,  
16 as like with any job, once you're -- once you're  
17 there and you -- you learn the basics, you know, it's  
18 a job that is significantly less about checking the  
19 boxes and more about having a really strong  
20 understanding of the case, the things in the case and  
21 figuring out how to get the information that you  
22 need.

23 Q Who was the head of the mitigation  
24 department?

25 A Her name is Anupama, A-N-U-P-A-M-A,



**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 49**

1 Vishwamitra, V-I-S-H-W-A-M-I-T-R-A, I believe.

2 Q And were you given, like, a handbook of  
3 the best practices or something when you first  
4 started?

5 A Uh-huh, yeah.

6 Q You still have that in your possession?

7 A No, I don't think so.

8 Q Okay. And did you receive training  
9 (inaudible)?

10 A Yes.

11 Q Did you get training?

12 A Uh-huh.

13 Q What did that entail?

14 A So -- so Anu -- she goes by Anu. She --  
15 from what I remember, you know, the first, you know,  
16 many weeks, she would bring me along with interviews,  
17 she would bring me along with client visits. It was  
18 a lot of job shadowing. It was a lot of -- like,  
19 they got records in, and I would be inputting them  
20 into case map. You know, she would go through and  
21 double-check, and you would talk about, you know,  
22 what was -- you know, what I was doing well, what I  
23 wasn't doing well.

24 Throughout my time there, like I said, I  
25 started doing clinical supervision hours with her.

1 And so a lot of that kind of became, you know, we  
2 would have set times where we would talk about cases.  
3 I would talk about kind of what I was thinking about  
4 cases, brainstorming sessions, ideas about, you know,  
5 how to develop a case more. That was always a  
6 regular thing there both with her and with the team  
7 in general because, you know, it's a  
8 multidisciplinary team.

9 Q So it was interactive and had on-the-job  
10 training as well as your supervision.

11 But were there ever any, like,  
12 classroom-type settings or testing on various aspects  
13 of doing your job?

14 A I mean, there were conferences. Like, I  
15 went to, you know, different capital conferences. I  
16 think that they did -- I think that that agency did a  
17 good job about training in that -- in that way. I  
18 remember they hosted one time a training on fetal  
19 alcohol syndrome.

20 We -- there's a national capital defense  
21 community that is fairly tight. People are connected  
22 via different LISTSERVs, and there are some  
23 agencies -- there's one in Florida particularly that  
24 does -- they used to do weekly, I think now it's  
25 maybe monthly, Zoom trainings on a variety of topics

1 for capital mitigation work. So it could be maybe  
2 best practices for working with a client who's a  
3 veteran, you know, how to read Department of Defense  
4 veteran records.

5 It could be a class training on, you  
6 know, intellectual disability, is a huge thing in the  
7 capital world, because it -- you have a client who is  
8 intellectually disabled, and they're not eligible for  
9 the death penalty, so significant training on how to  
10 identify -- identify symptoms of that in a client and  
11 then also how to interview family members for what's  
12 called "adaptive functioning" in your client, how to  
13 identify the experts, you know.

14 So there's -- there is a lot of training  
15 I felt both internal and a lot of training kind of  
16 external to the agency that we were encouraged to  
17 participate in.

18 Q Was there any training on dealing with  
19 security risks and security issues within the prison  
20 context when dealing with --

21 A Uh-huh.

22 Q -- the accused?

23 A Yeah. I mean, we would have -- and we  
24 held a monthly mitigation meeting. It would be an  
25 all-day meeting. It was a time to kind of brainstorm

1 cases with all the mitigation specialists together.  
2 So the ones in different parts of the state would  
3 travel into Atlanta. We would brainstorm cases. We  
4 would talk about concerns that -- you know, issues we  
5 were having with cases. And she would usually have a  
6 guest speaker that would kind of train us on  
7 different topics.

8           So, for example, I remember someone  
9 involved in law enforcement, I think, that came in  
10 one time to talk to us about different kinds of  
11 illicit drugs. And we had someone come in to talk to  
12 us about kind of assessing different sexuality in  
13 clients because a lot of male clients, especially,  
14 are uncomfortable, you know, talking about their  
15 sexuality. And there was a sex therapist and LGBT  
16 sex therapist. And he talked to us about, you know,  
17 kind of how to -- how to interview a client who may  
18 be closeted, for example.

19           So she would have different trainings  
20 like this on a monthly basis at our meetings. And we  
21 would often talk about safety issues both in the  
22 field. You know, you're going on -- knocking on  
23 random people's doors who don't know you. Safety  
24 issues with that was a big topic.

25           In terms of correctional facilities, you

1 know, I don't -- I don't remember a whole lot of  
2 discussion about security issues in correctional  
3 facilities because it wasn't -- you know, they had  
4 correctional officers there who were dealing with  
5 that. That wasn't something we had to be concerned  
6 with ourselves. It was when you had to be out in the  
7 field, you know, walking into someone's home.

8 We had a few -- there were a few people  
9 who had clients in the same facility, you know, and  
10 we might kind of talk about, you know, issues with  
11 scheduling visits or, you know, I'm going to go see  
12 my guy on this day, so don't go see your guy on that  
13 day because they can't both accommodate us kind of  
14 deal. It would be discussions like that, mostly.

15 Q So there was no training for you in terms  
16 of safety in a personal risk going into security  
17 facilities especially as a woman?

18 A I don't -- I don't think any of us felt  
19 like there was much of a risk. So there wasn't -- I  
20 mean, I don't know what that discussion would have  
21 looked like.

22 Q There was no guidance given on how to  
23 dress, how to interact when dealing with male inmates  
24 in a closed door high max prison environment?

25 A Well, there is a lot of -- there was a

1 lot of training on how to deal with interviewing  
2 different kinds of clients. There is a lot of  
3 training on how to -- you know, everybody's different  
4 and people have different ways that they're  
5 comfortable interacting with other people. And we  
6 had to be able to build relationships with people and  
7 get information out of them.

8 And so there was a lot of training on how  
9 to do that with different kinds of individuals. You  
10 know, someone who is, like, profoundly impaired, you  
11 know, you need to slow your -- you know, maybe talk a  
12 little bit slower. You need to be mindful about the  
13 sentence structure that you're using. You need to  
14 check in with them regularly to make sure that they  
15 can understand what you're saying, you know, that  
16 you're not using big run -- on sentences.

17 So there's a lot of training for that.  
18 How to assess your client's cognitive abilities and  
19 how to meet them where they're at in order to be able  
20 to get the information out of them that you  
21 ultimately need. That's -- that's what most of it  
22 was.

23 Q Okay. And what I'm getting at is kind of  
24 a little different. For example, when I started  
25 going into prisons and dealing with inmates on

1 one-on-ones, as a young woman, I was very  
2 specifically instructed on cut the makeup, nothing  
3 low cut, close-toed shoes.

4 A Yeah.

5 Q Pants, if preferable. To be on guard  
6 especially men that are not seeing women on a  
7 customary basis.

8 So did you not receive any kind of  
9 training along those lines?

10 A I mean, there would be discussions  
11 about -- I think it's common sense to never wear  
12 open-toed shoes in a correctional facility. You  
13 don't know what's on the floor. It's gross. And  
14 prior to this position, I had interned with the  
15 Southern Center for Human Rights for a year, and I  
16 interned with the Fulton County public defense office  
17 for a year. So with both of those positions, I was  
18 going into correctional facilities. And that was  
19 probably when I received my first kind of, you know,  
20 always wear close-toed shoes because you never know  
21 when someone's throwing something on the floor kind  
22 of deal.

23 With the capital defenders office, we  
24 all -- attorneys, investigators, mitigation  
25 specialists, we all dressed pretty casually. We had

1 a lot of discussion about things like wanting to make  
2 sure that there was not, like, a power dynamic  
3 barrier with a client. So, you know, I would -- I  
4 would often -- especially when going into a  
5 correctional facility or if I knew I was going to be  
6 hitting up someone's trailer in the backwoods of  
7 Georgia, I would be wearing jeans, sneakers and a  
8 top. You know, I did not want to look super  
9 professional. I did not want to look like someone  
10 that they needed to be scared of. I didn't want to  
11 look like there was going to be -- you know, I was  
12 going to be sitting there and be like, Tell me, blah,  
13 blah, blah, blah, blah.

14 So I tried to create, like, a casual  
15 environment. And we did that with all of our  
16 clients, I think. The focus was, you know, how to  
17 present in a way that is engaging, casual engaging,  
18 that reduces barriers to interaction with whatever  
19 client you're dealing with. How to -- how to be able  
20 to talk with clients so that they feel comfortable  
21 with you, that they feel like there is, you know,  
22 just a positive interaction so that they're going to  
23 tell you the information that you need to get.

24 Q And you weren't advised about any self  
25 protective measures for yourself?



**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 57**

1           A       I mean, I'm trying to think about the  
2 facilities that I went to when I worked there. Most  
3 of them were, like, small town county jails. You  
4 know, and security measures there vary pretty widely.  
5 You know, most of the facilities I went to would  
6 have, like, an officer right outside the door. You  
7 know, I would be in my room with my client. Usually,  
8 there would be, like, you know, a door with, like,  
9 the top half was, like, a window. And there would be  
10 an officer kind of sitting outside the whole time.  
11 That's how it was at (inaudible) where Ricky was.

12                   So, you know, there's always an officer  
13 there who I can indicate, I'm sorry, you know, if  
14 something's going on. You know, I always felt safe,  
15 and I also felt like all my clients knew I was there  
16 to help them. They all knew that we -- you know, the  
17 defense team at large, we were there to help. And I  
18 never -- I never felt unsafe with any of my clients.  
19 I never have. I never felt unsafe with any of them.

20           Q       Now, you talk about your prior experience  
21 in prisons that were in a small town or obviously not  
22 capital offense scenarios.

23                   Are you aware that Jackson SMU is the  
24 only high max --

25           A       Uh-huh.

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

Page 58

1 Q -- level --

2 A Yeah.

3 Q -- prison in the state, right?

4 A Yes.

5 Q Was that -- when you visited Ricky  
6 Dubose, was that the first time you'd been in a high  
7 max in Georgia before?

8 A For work purposes, I took a -- I took a  
9 class as part of my criminal justice studies, you  
10 know, back in undergrad that was, like, exploring the  
11 prison world. And it was, like, a summer class. And  
12 for the whole summer, we went and toured different  
13 facilities. I believe we went to something, like, 15  
14 correctional facilities.

15 So in that class, I remember going to  
16 Georgia Diagnostic, which is the main campus there.

17 Q Right.

18 A SMU is like a separate building.

19 Q It is.

20 A Yeah.

21 So I had not been to SMU before. I had  
22 been to Georgia Diagnostic. I toured death row. You  
23 know, I had been to a lot of facilities in the state  
24 just because of that class.

25 Q But not to the high max SMU --

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

**Page 59**

1           A     Yeah. Correct.

2           Q     And admittedly, that has higher risk  
3 inmates with more serious crimes?

4           A     Yeah, I think so.

5                   MR. BEGNAUD: Object to the form.

6 BY MS. MCGOVERN:

7           Q     People in high max generally are put  
8 there for a reason.

9                   Is that your understanding?

10          A     Yes.

11          Q     And you said you had an officer outside.  
12 That was outside a door when you were --

13          A     Uh-huh.

14          Q     -- meeting with Ricky, that there was an  
15 officer posted outside the door?

16          A     Yes.

17          Q     And were you locked in?

18          A     Yeah. I'm pretty sure they locked us in.

19          Q     So you're in a room with Ricky alone, and  
20 the officer is outside that needs a key to access,  
21 correct?

22          A     To be honest, I don't remember --

23          Q     That's okay.

24          A     -- perfectly. I think so.

25          Q     Okay.

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

**Page 60**

1           A       But I don't remember --

2           Q       **Sure.**

3           A       -- perfectly.

4           Q       And have you ever, in your coursework or  
5       in your professional capacity, those studies of  
6       injuries and harm to correctional officers, other  
7       inmates and visitors done by inmates in a  
8       correctional setting?

9           A       In my studies, no.

10          Q       In any capacity, have you become aware of  
11       inmate violence against others while in a  
12       correctional setting?

13          A       For sure. For sure. I know that  
14       correctional settings are not safe places for  
15       inmates, yes, and for officers. You know, I -- yeah,  
16       I'm obviously -- I'm obviously aware of that.

17          Q       And for women going into the prison,  
18       correct?

19          A       I don't know that. I don't know any -- I  
20       don't -- I don't know anything about -- I've never  
21       read any news, I've never seen data about women  
22       visitors or women defense teams particularly having  
23       security issues or safety issues. I've never read  
24       anything like that.

25          Q       Did you have any -- any inmates that you

1     dealt with in your career who have made inappropriate  
2     comments, been flirtatious or anything along those  
3     lines, in the course of your discussions?

4             A     Yes. Yeah, I think that most women  
5     working in the criminal justice field absolutely have  
6     gotten that from clients. I think a lot of -- a lot  
7     of clients have not lived lives where they have  
8     learned the most appropriate social behaviors. And  
9     yeah, a lot of times have not lived lives where they  
10    have learned appropriate social behaviors.

11                And they have made inappropriate  
12    comments. People made inappropriate comments. They  
13    still do. I think that that's probably always going  
14    to happen. You know, we had -- we had training.  
15    This is one of the things that we talked a lot about  
16    in those mitigation meetings, was how to -- how to  
17    have conversations with clients when that happens,  
18    you know, which was always to -- people do that  
19    because they haven't been taught correctly, you know,  
20    how to interact with people in a professional manner.  
21    Sometimes some of our clients probably had never  
22    really interacted with people in a professional  
23    manner before.

24                And so we were trained to really explain  
25    to them that's inappropriate. I am a member of your

1 defense team. It's not appropriate to have language  
2 like that. You know, these are the boundaries. I'm  
3 here to help you. I want to get to know a lot about  
4 you, but this is a hard boundary. You know, and  
5 that's a conversation that I have to have with  
6 clients, and I expect I will always have that  
7 conversation with clients because, you know, that's  
8 just -- that's a lot of people in the criminal  
9 justice system. They -- they can -- they can make  
10 inappropriate comment.

11 Q Some of the people in the criminal  
12 justice system actually have crimes against women  
13 which put them there as well, correct?

14 A Yes.

15 Q So it may be more than just not knowing  
16 boundaries?

17 A Well, I think when they are -- I mean, I  
18 would call that potentially not knowing boundaries.  
19 But, you know, when they're interacting that way with  
20 a professional person that is part of their defense  
21 team, I mean, I think it's very much not knowing  
22 boundaries.

23 Q Even if you're dealing hypothetically  
24 with a rapist, you're saying they don't -- just don't  
25 understand boundaries?

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 63**

1           A     I mean, I've never -- I've never had --  
2     I've been in that situation.

3           **Q     Okay.**

4           A     So I don't know.

5           **Q     Okay.**

6           A     I've never had -- I've never had a client  
7     who has been charged with -- I've been defending a  
8     client who is charged with rape.

9           **Q     Okay.**

10           MR. BEGNAUD:   And mind if we take a  
11     break at some point?

12           MS. MCGOVERN:   Yeah, let me just  
13     finish up --

14           MR. BEGNAUD:   Yeah.

15           MS. MCGOVERN:   -- just a little bit.  
16     I'm -- I need lunch too.

17     BY MS. MCGOVERN:

18           **Q     So -- and what was -- what was the worst**  
19     **comment that's been made to you in the context of**  
20     **doing your work that was inappropriate?**

21           A     Oh, gosh. I -- oh, okay. I thought this  
22     was a funny story. I don't know if you-all will  
23     think this is a funny story. This was a capital  
24     client of mine -- I want to be careful to be very  
25     vague because of I don't want to identify -- who had

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 64**

1 autism, and I think that that had a lot to do with  
2 the way he communicated. I think he was very -- felt  
3 very defensive about his social life because I was  
4 trying to really explore his -- what I believe to be  
5 his autism and was kind of really asking him, you  
6 know, lots of questions about his social life and  
7 interactions with other people and done -- you know,  
8 done a lot of talking to him about friendships,  
9 dating history, this and that.

10 And at one meeting, he said something to  
11 me like -- he said something to me like, You remember  
12 before, you were asking me why so-and-so is -- like,  
13 this girl that he had taken to the high school prom  
14 who was, like, his girlfriend in high school. He was  
15 like, Remember you were asking me why we broke up,  
16 and I said we just kind of stopped talking.

17 Well, the real reason why we broke up is  
18 because that night after prom, we were trying to have  
19 sex for the first time, and I was -- I couldn't get  
20 it in. And she was really embarrassed. And then she  
21 never wanted to talk to me again.

22 And when he told me this story at the  
23 time, I was like, Okay, what is he trying to say with  
24 this story? I think he feels embarrassed about  
25 his -- everything I've been uncovering about his



**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

Page 65

1 social life. He wants me to think that he's  
2 sizeable. He is wanting to turn this story about  
3 this girl -- you know, things aren't going well with  
4 this girl kind of around in a way that makes him kind  
5 of look a little more superior than it had in the  
6 past. And at the time, I -- I was just like, Oh,  
7 okay, and moved on.

8 The story came out of nowhere. We'd been  
9 talking about some other topics. He brought this  
10 story up, and I moved back to that original topic.  
11 And then I went back to the office. And this was  
12 something that we discussed at one of the mitigation  
13 meetings, was just what happened here, you know, how  
14 to kind of deal with that, yeah.

15 Q Oh, I guess I didn't see how that was a  
16 funny story.

17 A I think it was just -- I think, for me,  
18 at the time, it was -- it was -- I think because it  
19 came out of nowhere. Like, it was we were talking  
20 about something else, and he was like, Oh, oh, I got  
21 it. There's something I really wanted to tell you.  
22 I really wanted to tell you this.

23 I'm like, Okay, what?

24 And then he tells me this story.

25 And I'm like, That doesn't have anything

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 66**

1 to do with what we were talking about. Like, why is  
2 this what you're kind of fixated on right now in your  
3 head? Yeah.

4 Q Okay. But in terms of any flirtation  
5 with you, inappropriate comments with you, those  
6 occurred as well during the course of your work?

7 A Honestly, I think I have gotten actually  
8 way more flirtatious comments from family members  
9 than I have from clients.

10 Q But have you received them from the  
11 clients?

12 A Yeah, probably. Yeah, probably have.

13 Q Did you receive them from Dubose?

14 A No. No.

15 MS. MCGOVERN: Why don't we go ahead  
16 and take a break right now and then jump  
17 back into --

18 MR. BEGNAUD: Sounds good.

19 THE VIDEOGRAPHER: The time is  
20 11:28 a.m. We're now off the record.

21 (Whereupon, the video camera was  
22 turned off.)

23 (Whereupon, a brief recess was taken.)

24 (Whereupon, the video camera was  
25 turned on.)

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

**Page 67**

1 THE VIDEOGRAPHER: The time is

2 11:43 a.m. We're back on the record.

3 BY MS. MCGOVERN:

4 Q We talked a little bit about your  
5 experience with the Jackson SMP [sic].

6 And so as my understanding, Ricky Dubose  
7 was the first time you were actually in SMP?

8 A SMU.

9 Q Why did I say that? I'm sorry, I'm  
10 getting tired already.

11 SMU at Jackson, correct?

12 A Yes.

13 Q Okay. And were you provided with any  
14 information going in either through the facility or  
15 from your workplace about entering the high max  
16 prison to go visit Dubose?

17 A The -- I mean, the first several times I  
18 saw him, I went with other members of the team who  
19 had already been seeing him for a while. So, you  
20 know, they showed me what to do, this is where you  
21 go, this is where you park, this is how you go  
22 through security. You know, it was -- it was a few  
23 visits before I was going by myself. And that was  
24 true of any case I had. You know, for any new  
25 client, new facility, I pretty much always went at

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 68**

1 least the first time, you know, if not a few times,  
2 with another member of the team.

3 **Q And when you went through, you just**  
4 **checked in and signed in and went through a scanner?**

5 A So at SMU, from my memory -- it's been a  
6 few years since I've been there, but from my memory,  
7 you know, you come in through the gate, and then  
8 there's, like, a standalone security office that you  
9 go through. You go through a metal detector, all of  
10 your -- you know, your things, your case notebook. I  
11 would only just bring in my case notebook and a pen.  
12 And, you know, I wouldn't bring in, like, my whole  
13 file or anything like that. And I don't remember  
14 ever having needed to bring in, like, a computer.

15 So it was always just my case notebook.  
16 They would flip through that. They would -- they  
17 would look at -- you know, just kind of flip through  
18 to make sure nothing was in there. You would have to  
19 kind of, like, turn your pockets inside out to show  
20 that there's nothing in your pocket. If we were  
21 wearing pants, which, you know, I always wore pants,  
22 you'd have to kind of, like, roll them up, pull them  
23 up and show -- you know, you'd have to take your  
24 shoes off too to go through the metal detector. But  
25 roll your pants up, show that there's nothing, I

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 69**

1 don't know, stuck in your pant leg or something,  
2 stuck in your socks. You know, they would pat you  
3 down if needed. And then you would exit the security  
4 box when you were cleared, and you would go on  
5 through to the main facility.

6 Q You go through the sally port and then  
7 go --

8 A Yes.

9 Q -- onto the facility? Okay.

10 And you were aware that Dubose had been  
11 obviously a prior flight risk based on --

12 A Yes.

13 Q -- his prior conviction, correct? And I  
14 just need a verbal -- a clear verbal yes for the --

15 A Yeah.

16 Q Okay. And were you aware that he had had  
17 previous disciplinary reports, several of them for  
18 contraband?

19 A Yes.

20 Q You were?

21 A Yes.

22 Q Okay. And how did you become aware of  
23 that?

24 A Because I was a member of his defense  
25 team. I had every record ever generated on him.

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 70**

1           Q     So every time he got a disciplinary  
2     report, you would receive a copy of that?

3           A     Yes.

4           Q     Okay. And so you would have knowledge  
5     that he was involved with -- with some type of  
6     contraband or another?

7           A     In his correctional career, yes, I knew  
8     about all the disciplinary infractions that he got  
9     through his correctional career.

10          Q     Including at Jackson?

11          A     Yes.

12          Q     Okay. So you know that there had been an  
13     issue with that?

14          A     Yes.

15          Q     Was it ever discussed with him?

16          A     Yes.

17               MR. BEGNAUD: And objection as far  
18     as -- and just for the record just so I can  
19     do this for the record.

20               THE WITNESS: Yeah, yeah, yeah, I  
21     don't want to -- yeah.

22               MR. BEGNAUD: Just for the record,  
23     obviously, Mr. Dubose, who has passed away,  
24     has rights and, you know, was your -- the  
25     defense team's client, and so there is

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

Page 71

1 attorney/client privilege associated with  
2 any communications between Ms. Engleman and  
3 Mr. Dubose. And so, you know, we'll just  
4 be aware of that in the deposition.

5 THE WITNESS: Okay.

6 MS. MCGOVERN: That's fine.

7 BY MS. MCGOVERN:

8 Q Was it your understanding that he had  
9 been -- strike that. Just strike that.

10 So how did you initially become involved  
11 in the Dubose case?

12 A So like I said, I started working there  
13 in August of 2017. The situation with Ricky in which  
14 he, you know, escaped, there was the -- the  
15 correctional officers were murdered on the prison.  
16 But that had happened in June, two months prior.

17 He was represented -- so the capital  
18 defenders office has, like, multiple branches  
19 throughout the state just to kind of help facilitate  
20 representing people throughout the state. I worked  
21 at the Atlanta branch. There were branches in  
22 Athens, Macon, Tifton and Brunswick.

23 The Macon branch was representing Ricky.  
24 They had a mitigation specialist who was already on  
25 the case representing Ricky, but she was going on

1 maternity leave. And so they needed someone to kind  
2 of fill in while she was going to be gone. And since  
3 I was new to the office, meaning I didn't already  
4 have a full caseload, they thought that I -- and I  
5 knew the director of mitigation was also kind of  
6 pulled in to help.

7 So she was pulled in to help, and it was  
8 kind of like, Lily is going to help with this as well  
9 while the other mitigation person is on maternity  
10 leave. And so that's how I initially got started in  
11 the case.

12 Q And how long were you working on the case  
13 file in advance of -- with Ricky in advance of his  
14 penalty phase?

15 A I don't understand the question.

16 Q How long were you working on the  
17 mitigation aspect of the file? How many months,  
18 weeks?

19 A Before he went to trial?

20 Q Uh-huh.

21 A Is that the question? He -- so he went  
22 to trial after I was fired. So I worked on his case  
23 the entire time I was at the capital defenders  
24 office.

25 Q Okay.



**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

**Page 73**

1           A     Yeah.

2           Q     All right. So I'm trying to gauge from  
3 when this person had maternity leave.

4                     And how long have you been there when  
5 that happened?

6           A     I was immediate -- when I started working  
7 there, there was several cases I was immediately put  
8 on. His was one of the ones I was immediately put  
9 on.

10          Q     All right. And so you were tasked with  
11 a -- working on the penalty -- death penalty phase of  
12 his case in the sentencing, not the underlying  
13 defense. Is that accurate?

14          A     That's correct. It's a team effort. You  
15 know, it's a team effort, and, of course, you know,  
16 it's not like you work in silos.

17          Q     Sure.

18          A     It all kind of blends together to some  
19 extent. But for a capital case, you have a  
20 mitigation specialist, mitigation investigator that  
21 primarily focuses on the penalty phase, and you have  
22 a fact investigator that focuses more on the actual,  
23 you know, offense.

24          Q     Was there any dispute in your mind that  
25 he had, in fact, previously escaped from prison?

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

**Page 74**

1 A No.

2 Q Was there any dispute in your mind that  
3 he had been involved in the murder of two  
4 correctional officers?

5 A No.

6 Q Okay. So you did know that going in --

7 A Yes.

8 Q -- and you were looking at mitigating a  
9 death penalty --

10 A Yes.

11 Q -- sentence?

12 A That was what all my cases were.

13 Q Okay.

14 A Mitigating (inaudible).

15 Q All right. Did it cause concern for you  
16 being in close quarters with an individual who had  
17 previously escaped and who had murdered actual  
18 correctional officers?

19 A No.

20 Q And why not?

21 A I felt very secure in the facility. I  
22 felt like they had good security. Ricky was  
23 handcuffed and in the leg chains, I don't know  
24 exactly what they're called, the ankle cuffs, every  
25 visit I had with him to my memory. He was under very

1 strict scrutiny there. We -- I knew that anywhere he  
2 went, he had like three officers with him at all  
3 times, you know.

4 And beyond that, like I said before, I --  
5 I felt safe with all of my clients, and they'd all --  
6 they were all alleged to have killed people. That  
7 was all of their -- you know, they're all facing the  
8 death penalty. And you get that in Georgia, you  
9 know, in this country because you're alleged to have  
10 killed people. And that was obviously -- I knew  
11 that. I worked there. I knew that all of my clients  
12 were going to be alleged murderers, you know. You  
13 don't -- you don't agree to have a job like that  
14 unless you're personally comfortable dealing with  
15 people who are alleged have to done those kinds of  
16 offenses and unless you have a -- I think a personal  
17 sense of your own, you know, I'm -- I can handle  
18 whatever situation comes my way, and I feel equipped,  
19 and, you know, I just always felt that way.

20 And with that facility in particular, I  
21 felt very secure. I thought that they did -- you  
22 know, there was always an officer right outside the  
23 door. And -- and I went there regularly, and I got  
24 to know the officers. And I felt -- you know, I  
25 felt -- I felt safe there.

1           Q     Was there anything specific in regard to  
2     the facility that made you feel you said safer in  
3     that facility?

4           A     I mean, it's the most secure facility  
5     I've ever been to. Like, there's so many sally ports  
6     you have to go through. Ricky was always handcuffed  
7     and, you know, the feet things, you know. Some of my  
8     clients weren't, and I felt safe with those clients  
9     too, but yeah.

10          Q     Okay. With someone who had previously  
11     escaped from prison, would you agree that security  
12     and ensuring that didn't happen again needed to be a  
13     high priority for -- for Jackson SMU?

14          A     Sure.

15          Q     And would you agree that security is a  
16     paramount importance in a high max prison setting?

17          A     Sure.

18          Q     Now, were you aware that there were  
19     cameras located throughout the facility when you  
20     would see -- see your client at -- at Jackson?

21          A     Yes. I mean, you go through the sally  
22     ports. You go through that security, standalone  
23     security place. You know, of course, there are  
24     cameras everywhere. When I would come into the main  
25     facility I would come in. There is, like, a lobby

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 77**

1 that I would wait in. There were cameras there. And  
2 then when they were -- when they had him set up for  
3 the visit, they would -- you know, an officer would  
4 come and get me. They would walk me through another  
5 sally port. We would take a left, go down this  
6 hallway, and the visitation room was down there.  
7 And, you know, of course, there are cameras all up  
8 on -- you know, walking down to the visitation room.

9 **Q Were you aware that there was a camera in**  
10 **the visitation room?**

11 **A** I was aware that there was a camera. I  
12 had no idea it was on.

13 **Q And it was certainly not recording**  
14 **anything verbally that was --**

15 **A** Now I know --

16 **Q -- being discussed?**

17 **A** Now I know that. Now I know that.

18 **Q That's your understanding, correct?**

19 **A** Yes. I mean, at the time, I assumed that  
20 it would not be on at all for a legal visit.

21 **Q And I understand you're not an actual**  
22 **attorney, but to your understanding of**  
23 **attorney/client privilege, you understand that's only**  
24 **referred to communications between a client and**  
25 **someone on their legal team?**

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

Page 78

1 MR. BEGNAUD: Object to the form.

2 You can answer.

3 A Okay. Yes, but I -- I think most people  
4 in my -- on my defense team, including myself and  
5 every defense person who I've really spoken to you  
6 about this, you know, body language is communication,  
7 writing is communication. I would bring my notebook  
8 for every visit and write in it. That's  
9 communication. You know, the way that you're  
10 interacting with -- we're communicating right now.  
11 Even if we weren't talking, we're communicating. So,  
12 you know, I -- I have always thought communication  
13 meant a fairly, you know, broad meaning of  
14 communication.

15 BY MS. MCGOVERN:

16 Q But you don't have an understanding  
17 other -- of the Georgia bar or any other legal  
18 standards that indicate that anything beyond the  
19 verbal communications between an attorney and a  
20 client are protected by attorney/client privilege,  
21 are you?

22 MR. BEGNAUD: Object to the form.

23 You can answer.

24 BY MS. MCGOVERN:

25 Q I'm not asking for a legal opinion. I'm

1 just saying you're not aware of any authority that  
2 states that anything beyond verbal communications is  
3 protected by attorney/client --

4 A No.

5 Q -- privilege?

6 A I don't -- I'm not an attorney, so I just  
7 don't know stuff like that.

8 Q So this is just something you've heard  
9 around and you surmise, but you don't have any -- any  
10 actual support for that position, correct?

11 A I have always been told in any law office  
12 I've worked at, which is now four, that my  
13 interactions with my client were privileged.

14 Q But you do not have any authority that  
15 supports the position anything beyond verbal  
16 communications is protected?

17 A No.

18 Q Verbal and written communications is  
19 protected, correct?

20 A Yes, that's correct.

21 Q Okay. And in terms of you saw the  
22 camera, you didn't ask anyone if it was on, you  
23 didn't make any inquiry, correct?

24 A No.

25 Q And do you have an understanding why

1     there would be a need for cameras to be on Ricky  
2     Dubose wherever he was located to some degree to  
3     protect both the staff, the visitors and the facility  
4     from any adverse event happening, correct? You  
5     understand there would be a reasonable justification  
6     to have a camera --

7           A     Absolutely, except for a legal visit for  
8     sure. And there were always cameras on him, you  
9     know. I knew that. But I don't -- I don't think  
10    that it's appropriate for there to be a camera on a  
11    legal visit.

12          Q     But you -- you can't assert anything that  
13    would legally support that that was not appropriate  
14    or authorized?

15          A     No.

16          Q     And you were locked in a room with a man  
17    who had, to your understanding, escaped and killed  
18    two correctional officers and at the time that you  
19    had a concern that there might be a camera  
20    monitoring?

21          A     Could you rephrase that?

22          Q     You were locked in the room with Ricky  
23    Dubose?

24          A     Yes.

25          Q     Okay. And have you considered that the



**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 81**

1 camera may have been for your personal safety?

2 MR. BEGNAUD: Object to the form.

3 Go ahead.

4 BY MS. MCGOVERN:

5 Q I just asked if you considered that.

6 A No, I don't -- I don't --

7 Q You haven't --

8 A I have not considered that.

9 Q Okay. And you do not have any training  
10 in POST certification, security issues within the  
11 prison, context or any other professional training in  
12 terms of how to manage security in a facility such as  
13 Jackson, correct?

14 A Yes, that's correct.

15 Q Okay. You're aware that my client,  
16 Nathan Adkerson, did not work at Jackson SMU. He was  
17 independently employed by OPS, correct?

18 A Yes. Yes, I know that.

19 Q And were you aware that Jackson SMU  
20 had -- was involved -- and their warden in setting up  
21 surveillance cameras and other security measures  
22 within that particular prison?

23 MR. BEGNAUD: Object to the form. I  
24 didn't track that.

25 THE WITNESS: Me either, sorry.

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

**Page 82**

1 MS. MCGOVERN: (Inaudible) complex.

2 BY MS. MCGOVERN:

3 Q So you don't have any knowledge or  
4 information that demonstrates that OPS oversaw  
5 security measures at Jackson SMU, do you?

6 A No, I'd never heard of OPS --

7 Q Okay.

8 A -- really before this.

9 Q And would it be your general assumption  
10 that each prison facility or DOC in general would be  
11 in charge of those security measures?

12 A I honestly have no idea.

13 Q You don't know (inaudible).

14 A I've never thought of it -- about it  
15 before.

16 Q Sure.

17 You basically can't give testimony one  
18 way or the other on that?

19 A Right.

20 Q Okay.

21 A I have no idea.

22 Q That's fine.

23 And you don't have any specific knowledge  
24 that Nathan Adkerson was in any way involved in  
25 putting any cameras in, running cameras or anything

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 83**

1     **else on the visits you had with Ricky Dubose?**

2           A     No, I don't have knowledge.

3           Q     **Okay. And what I'm asking you about**  
4     **today is your personal knowledge.**

5           A     Right.

6           Q     You don't have any knowledge or  
7     information on how OPS became involved in this  
8     investigation of Ricky Dubose and his interactions  
9     with you, do you? And I don't want to know what you  
10    talked about with your attorneys.

11          A     Well, I mean, I know -- I've seen the  
12    discovery in my criminal case.

13          Q     **Okay.**

14          A     So it's all in there.

15          Q     **Okay.**

16          A     Is that what you're referring to?

17          Q     **Sure.**

18          A     Okay. Yes.

19          Q     **Okay. And what is your understanding?**

20          A     My understanding is that sometime in  
21    mid-September of 2019, maybe the 13th or something  
22    like that, that there was a shakedown and contraband  
23    was found in Ricky's cell. And they found stuff that  
24    I honestly don't fully remember, but that prompted  
25    them to want to review the video of my latest visit

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 84**

1 with him, which was on September 6th.

2 Q Okay. And do you -- did you know or have  
3 any recollection that Warden Morales and his  
4 assistant located a letter indicating that someone by  
5 the name of L was going to be bringing contraband  
6 into the prison?

7 A I --

8 MR. BEGNAUD: Object to the form. I  
9 think it's a mischaracterization of the  
10 letter.

11 MS. MCGOVERN: I was just asking if  
12 she knew that or not.

13 MR. BEGNAUD: You can answer.

14 A Okay. I've seen that in the discovery.

15 BY MS. MCGOVERN:

16 Q Okay. And you don't personally have any  
17 knowledge of anyone else with the initial L who was  
18 conducting visits with Ricky Dubose during that time  
19 period, do you?

20 A No. The only people doing visits with  
21 him were his defense team.

22 Q Right.

23 You don't have any personal knowledge  
24 of -- well, strike that. All right.

25 So the visit on September 6th, 2019, I

LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Page 85

1 think you had -- was this your first visit with Ricky  
2 Dubose or this was -- was later on?

3 A I --

4 Q The subject visit that was recorded on  
5 September 6th, 2019, had you already had prior visits  
6 with Ricky?

7 A I had been visiting with him for  
8 two years.

9 Q Okay. All right. And so you were  
10 familiar with the setting --

11 A Yes.

12 Q -- and that there had it was a camera in  
13 the room?

14 A Yes.

15 Q And the dynamic of that visit, how it was  
16 set up, was it very different from your prior visits?

17 A No, it was very much the same.

18 Q Okay. All right. And I'm going to try  
19 to pull this up on my --

20 MS. MCGOVERN: I don't know how best  
21 you want to do this with Zoom, folks,  
22 anyone. I can read out where we are. On  
23 the video. I'm not going to go through the  
24 whole thing.

25 MR. GREEN: (Inaudible) share the

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

Page 86

1 screen?

2 MS. MCGOVERN: I have no idea if I can  
3 share the screen. This isn't my computer,  
4 so I don't think I can show the witness.  
5 I'll tell you the point markers, but I have  
6 no idea how I can do that.

7 MR. BEGNAUD: Let's go off the record.

8 THE COURT REPORTER: Go off the  
9 record, please.

10 THE VIDEOGRAPHER: The time is  
11 12:02 p.m. We're now off the record.

12 (Whereupon, the video camera was  
13 turned off.)

14 (Whereupon, a brief recess was taken.)

15 (Whereupon, the video camera was  
16 turned on.)

17 THE VIDEOGRAPHER: The time is  
18 12:04 p.m. We're back on the record.

19 BY MS. MCGOVERN:

20 Q We're going back on.

21 We are playing the video from the visit  
22 from September 6th, 2009 [sic]. I am at time marker  
23 3:47:30. And I'm going to hit play, and I'm going to  
24 stop it periodically.

25 (A video was played during the

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

**Page 87**

1 deposition.)

2 BY MS. MCGOVERN:

3 Q We see Mr. Dubose looking down here.

4 Do you have a recollection of what  
5 you-all may have been discussing at this point this  
6 time? We're at 3:47:51.

7 MR. BEGNAUD: Obviously without --

8 THE WITNESS: Yeah.

9 MR. BEGNAUD: -- telling us  
10 (inaudible).

11 THE WITNESS: (Inaudible).

12 MS. MCGOVERN: I'm not (inaudible).

13 A I -- I under- -- I have a memory of kind  
14 of the trajectory of this hour and a half long visit.  
15 I mean, I can't say exactly what we were talking  
16 about at that time. But I do have a memory of kind  
17 of, you know, the visit in general.

18 BY MS. MCGOVERN:

19 Q Okay. And I've stopped it at 3:47:58 for  
20 a second. And we have -- Mr. Dubose is sort of  
21 positioned, so his back is squarely against the  
22 camera. So it kind of obliterates the view of the  
23 front of his body. Is that accurate?

24 A Yes.

25 Q Okay. I'm going to stop it. We're at

1 3:48:05.

2 A Uh-huh.

3 Q And you -- you are bending your head to  
4 look under the table.

5 What is occurring at that point in time?  
6 I'm not asking for communications. I'm asking for,  
7 why are you putting your head under the table at that  
8 point?

9 MR. BEGNAUD: First, I object to the  
10 (inaudible).

11 BY MS. MCGOVERN:

12 Q Adjacent to the table at that point?

13 A I don't think I know how to answer that  
14 question without --

15 Q I'm not asking for communications.

16 Why -- why were you --

17 A We were -- we were looking at the tattoos  
18 on his feet.

19 Q Okay. Because my understanding of this,  
20 if we can go back, is that he still has his socks and  
21 shoes on. We can go back to reiterate that.

22 A I mean, I don't -- there's that one shoe  
23 right there that I can see. But we -- we were --  
24 what I remember about this visit is that the  
25 beginning started off very heavy. And if you watch



1 the entire visit, you'll see that. The beginning, it  
2 was a very heavy visit. Ricky was not doing well  
3 emotionally, and we talked about that for quite a  
4 long time at the beginning of the visit.

5 I remember being concerned because I had  
6 gone in with an agenda. You know, I had certain  
7 things I needed to talk to my clients about when I  
8 would visit them. And I knew that what I needed to  
9 talk to him about was also pretty heavy. So I was a  
10 little bit concerned to, like, show up. And he  
11 was -- he was not doing well because I didn't want to  
12 put him into, like, a worse place.

13 And I remember being very mindful in this  
14 visit of, like, how do I control how this goes. And  
15 so we kind of discussed what he wanted to discuss,  
16 you know, during the first part. And then I tried to  
17 kind of, like, bring him up mood-wise. We started  
18 talking about his tattoos. He has a lot, you know.  
19 He has a lot of them.

20 And I had learned from previous visits  
21 that getting him to talk about his tattoos was a way  
22 that he could kind of boost his mood because he had  
23 stories that went along with them. You know, he had  
24 some, like, cartoon character ones that he liked to  
25 talk about. And so it was very strategic attempt on

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 90**

1 my part to get him to get his mind off of what we had  
2 been discussing and kind of have a breather where he  
3 could kind of, you know, have his mood boosted, talk  
4 about something a little bit more light-hearted so  
5 that then I could go into what I needed to talk to  
6 him about, which you see if you continue watching the  
7 video. Kind of as it gets closer to the end, you'll  
8 see it gets more serious again.

9 I remember walking away from this video  
10 thinking like, Good job, Lily. You handled that well  
11 as a social worker, really read that well. And so it  
12 was, again, kind of shocking when I got arrested  
13 because of this visit. You know, I remember we --  
14 you know, we were talking about tattoos on his head.  
15 We were talking about tattoos on different parts of  
16 his body. You know, I don't remember exactly what  
17 all areas we kind of talked about. But it was -- it  
18 was a conversation that went on for a while.

19 Q Well, yeah, obviously, we're more than  
20 halfway --

21 A Uh-huh.

22 Q -- through at this point. But he clearly  
23 has tattoos all over his arms --

24 A Yes.

25 Q -- all over his body.

## LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Page 91

1 A Yes.

2 Q But he doesn't -- let me just get the  
3 whole --

4 A Okay.

5 Q She'll get mad at us for talking over  
6 each other.

7 But he didn't show you anything on his  
8 arms, hands, neck, anything local during the course  
9 of this. And we can replay it, but that's not -- you  
10 didn't choose to go into anything readily visible in  
11 terms of tattoos?

12 A I -- I don't remember. I remember asking  
13 him, What tattoos did you get that hurt the most,  
14 like what was the most painful, you know, tattoo that  
15 you got. I think that that's why he started showing  
16 me the ones on his feet, if I remember correctly.

17 Q Okay. And so he obviously came into the  
18 room with his socks and his state-issued like --

19 A Slide.

20 Q -- slide shoes, right?

21 Okay. And so I've backed it up a little  
22 to play it because he's taken no action as of yet to  
23 remove them. So, you know, I'm not trying to  
24 mislead, but he's still got the socks and the shoes  
25 on. This was earlier in your conversation at

LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.  
Lily Engleman on 02/14/2023

Page 92

1 3:45:35. Now you're smiling at 3:45, so clearly,  
2 whatever has lighten up --

3 A Uh-huh.

4 Q -- has lightened up a little. The  
5 heaviness has lifted?

6 A I -- I assume so.

7 Q Okay. And this is prior to anything with  
8 the -- with the showing the tattoos on the feet. And  
9 now he seems to be looking up towards the camera  
10 there.

11 Do you know what that might have been  
12 about?

13 A He was just twisting his neck. He'd been  
14 sitting in the position for a while.

15 Q You're smiling again. So it seems like  
16 you've gotten through some of the heaviness and it's  
17 in a lighter place.

18 Does that seem fair?

19 A Yes, I would assume so.

20 Q And now it almost looks like you're  
21 laughing here at 3:47.

22 A Uh-huh.

23 Q You don't recall what -- okay. Now he  
24 bends over. He bends over the table, 3:47:11. And  
25 you don't recall what caused you to laugh right

1 before then?

2 A I don't remember.

3 Q So he -- Nichols has -- I'm sorry, Dubose  
4 has his bed under the table, and he's leaning over,  
5 looking up at you, and you're laughing.

6 A Uh-huh.

7 Q Do you know what that's regarding at all?

8 A No.

9 Q And he's taken no action that I can see  
10 to remove socks or shoes as of yet, correct? You  
11 haven't seen anything different, have you?

12 A I mean, his body is in the way. Not that  
13 I can tell with his body in the way.

14 Q It doesn't look like his arms are moving  
15 to remove anything at that juncture yet, does it?

16 A No.

17 Q At 3:47:58, he's leaning over again and  
18 not all the way under the table, just leaning on the  
19 table, correct? And then here at 3:48 --

20 A Uh-huh.

21 Q So he had just leaned over, but there did  
22 not appear to be any action by his arms to remove  
23 socks and shoes at that point in time when you --  
24 when you looked down. Your head is not totally under  
25 the table, but it's adjacent to the table at 3:48:05.

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 94**

1                   So why did you put your head under there  
2   while he had the shoes and sock on?

3                   MR. BEGNAUD: Object to the form.

4                   You can answer.

5           A        Okay. I mean, I don't know. We looked  
6   under the table a lot. Like, this happened for other  
7   visits. We would look at his shoes. He's a big shoe  
8   guy. He wanted to always notice my shoes. Sometimes  
9   he would come in with Nikes. We would talk about his  
10  Nikes. I don't know. I don't remember. This is  
11  three and a half years ago. But it was not unusual  
12  for me to look under the table for all of my clients  
13  and talk about, you know, shoes, talk about different  
14  things. That was not remotely unusual.

15  BY MS. MCGOVERN:

16           Q       Well, let me go back.

17                   He was wearing Nikes --

18           A        Not this time.

19           Q        -- while he was in high max?

20           A        Yeah.

21           Q        So he was allowed to have -- are you  
22  aware that would have been contraband for him to have  
23  Nikes?

24           A        He had them. He would walk around in  
25  them.

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 95**

1           Q     Okay. You don't know how he came to get  
2 those?

3           A     I don't know.

4           Q     You're aware that would not be standard  
5 issue?

6           A     That was -- that was always my  
7 impression, but he -- he had them, he wore them, he  
8 walked around in them.

9           Q     Okay. And then you said he would like to  
10 look at your shoes?

11          A     He was a big shoe guy. And there were --  
12 I specifically remember a pair of Adidas that I had  
13 that he -- they were -- they were pretty (inaudible)  
14 Adidas, and I would wear them sometimes because, like  
15 I said, I always wanted to dress fairly casually.  
16 And I -- I do remember him commenting -- you know,  
17 he'd be like, Oh, I like those shoes. And then if I  
18 wore them again a few months later, he'd be like, Oh,  
19 you're wearing those Adidas that I like, you know,  
20 things like that.

21          Q     So you testified previously you had --  
22 you'd been provided with information --

23          A     Uh-huh.

24          Q     -- about his prior instances of  
25 contraband. You were well aware of his disciplinary

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 96**

1 reports. You were aware that he previously escaped.  
2 You were aware these issues have come to light in  
3 terms of other contraband issues, and yet you felt it  
4 was regular and customary to put a head under the  
5 table in a high max prison during a visit?

6 A Yes.

7 MR. BEGNAUD: Object to the form.

8 BY MS. MCGOVERN:

9 Q Okay. I need your answer, though,  
10 because I don't think the Court Reporter got it.

11 A Yes.

12 Q Did you have any understanding why that  
13 might be concerning to security and people within the  
14 high max prison environment?

15 MR. BEGNAUD: Object to the form.

16 You can answer.

17 A Okay. I don't think it's any of their  
18 business. I don't. I think that I'm there as a  
19 member of his defense team, and I need to have the  
20 interactions with my client that I need to have to  
21 get the information from him that I need to have the  
22 best defense case for him that we can build. And  
23 it's, frankly, I don't think any of the prison  
24 people's concern what -- how a defense team is  
25 conducting their business with their client.



1 BY MS. MCGOVERN:

2 Q So if individuals are blocking cameras  
3 with the back and going under the table where they  
4 can't be seen and you have an inmate with frequent  
5 contraband issues, it's none of the prison's business  
6 whether or not contraband can be passed to an inmate  
7 that's previously escaped?

8 A Well, I knew I wasn't giving him  
9 contraband. So no, that was not something I ever --

10 Q How are they --

11 A -- thought about.

12 Q How are they going to know that, that  
13 you're not doing that?

14 A Because I had --

15 MR. BEGNAUD: Object to the form.

16 A I had no idea the camera was on. Had no  
17 idea the camera was on. Ricky was handcuffed. He  
18 was in leg irons. And there was an officer sitting  
19 outside. So I knew I wasn't giving him anything. I  
20 knew no one in the team was giving him anything.  
21 That was never a concern. What was a concern was  
22 coming here and making sure that we were able to, you  
23 know, have the best defense that we could have and  
24 have the interactions with our clients that we needed  
25 to have.

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

**Page 98**

1 BY MS. MCGOVERN:

2 Q The concern for the prison was to make  
3 sure that Ricky Dubose didn't get contraband, harm  
4 someone or escape, correct?

5 MR. BEGNAUD: Object to the form.

6 A Yes.

7 BY MS. MCGOVERN:

8 Q And they didn't know you personally, know  
9 what you were up to or not. They had to go on based  
10 on their protocols and procedures to ensure there was  
11 no contraband, correct?

12 MR. BEGNAUD: Object to the form.

13 Ms. McGovern, do you mind giving my  
14 client a little more space? Thank you.

15 A That is the prison's concern. Our  
16 concern as the defense team is to have -- went off  
17 again. Our concern as the defense team, which I'm  
18 sure you know as an attorney yourself, is to be able  
19 to have the conversations you need to have with your  
20 client, the interactions you need to have with your  
21 client. I'm -- I'm not there to be thinking about  
22 what the prison officials are thinking about. I'm  
23 there to do my job.

24 MS. MCGOVERN: Okay. I'm going to  
25 move to strike as nonresponsive.

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 99**

1 BY MS. MCGOVERN:

2 Q I'm going to try to go about this at a  
3 different angle.

4 You had your job to do, right?

5 A Uh-huh.

6 Q And the correctional officers and the  
7 warden and the security at this high max prison had  
8 their job to do --

9 MR. BEGNAUD: Object to the form.

10 BY MS. MCGOVERN:

11 Q -- correct?

12 MS. MCGOVERN: What's the basis for  
13 that objection?

14 MR. BEGNAUD: It's all argumentative.  
15 I mean --

16 MS. MCGOVERN: It's not. It's not.

17 MR. BEGNAUD: We can agree to  
18 disagree.

19 MS. MCGOVERN: Okay.

20 A Yes, that's correct.

21 BY MS. MCGOVERN:

22 Q Okay. And you don't have a knowledge or  
23 understanding of what goes into that job, correct?

24 A No, I don't.

25 Q Okay. And you've already agreed, I

1 believe, that those are legitimate concerns in a high  
2 max prison with someone who's escaped to be concerned  
3 about security risks?

4 A Yes.

5 Q And with someone who's previously had  
6 issues with contraband with individuals going to a  
7 table where they can't be observed by the officer  
8 outside the room or anyone else, it's fair to say  
9 that no one knows what can happen under that table  
10 except for you?

11 A That's correct, because it's no one  
12 else's business what happens in a legal team meeting.  
13 Like a legal meeting with a client, it's no one  
14 else's business.

15 Q Are you aware that, historically, there  
16 have been cases of defense teams -- I'm not even  
17 saying yours -- providing contraband to inmates?  
18 This is something that does, at time, occur?

19 A It does, at time, occur, but, you know --  
20 yes, that does, at time, occur.

21 Q And the risk if something like that  
22 happens can result in harm to people working in the  
23 prison, people outside the prison or other inmates.  
24 If contraband gets in there can be a danger to  
25 others. Isn't that fair?

1 A Yes.

2 Q And those risks can include and have  
3 included with Mr. Dubose before injury and death to  
4 others including correctional officers, correct?

5 A With contraband? I'm confused.

6 Could you please restate that?

7 Q The contraband can include many things  
8 including shanks and items that can be made into  
9 shanks. There's a lot of different kinds of  
10 contraband.

11 Isn't it fair to say with the risk of  
12 contraband getting to someone like Ricky Dubose,  
13 there is a risk of serious injury or death to  
14 individuals, including the individuals that have to  
15 work inside that prison every day?

16 A Sure.

17 MR. BEGNAUD: Object to the form.

18 BY MS. MCGOVERN:

19 Q And that's a significant concern for the  
20 individuals at the prison that they might be injured  
21 or harmed in the course of their work --

22 A Sure.

23 Q -- on a daily basis in a high max prison,  
24 correct?

25 A Yes.

1 Q And I'm sure, sitting here today, you  
2 would not be someone who would want someone within a  
3 high max prison that works there every day to be at  
4 risk of injury or death?

5 A Of course not.

6 Q Okay. And, in fact, as a result of  
7 Mr. Dubose, two correctional officers had already  
8 died --

9 A Yes.

10 Q -- correct?

11 A Yes.

12 MS. MCGOVERN: I'm trying to show the  
13 video is the only thing. Let me get  
14 through the video, and I can totally scoot  
15 out of the way.

16 BY MS. MCGOVERN:

17 Q Do you know anything about the family  
18 members that were related to the individuals that  
19 died?

20 A I know a little bit.

21 Q They suffered greatly, didn't they?

22 A Yes.

23 Q We're at 3:48:05. And you are at this  
24 point looking under the table. Continuing to look  
25 under the table. And then your head's back up at

1 3:48:19. Then your head went back down about  
2 3:48:21. You're still looking under the table, and  
3 your head's back up 3:48:30.

4 Now, during that time period, are you  
5 able to tell me what you were looking at?

6 A I don't know. I don't remember.

7 Q Okay. And I haven't -- and tell me if  
8 I've missed it. I haven't noticed him doing anything  
9 with shoes or socks to remove his socks as of yet.

10 Did I miss something there or --

11 A I don't feel like I can see that. I feel  
12 like I just see a little bit of his foot on the left.  
13 I can't see the other foot. I don't -- I don't feel  
14 like I can make a statement based on how you can't  
15 see anything to do with his feet, really.

16 Q I haven't seen any arm movement that  
17 looked like it was removing a sock on the right-hand  
18 side, have you?

19 MR. BEGNAUD: Object to the form.

20 MS. MCGOVERN: Well, we're going  
21 through the video, so she can give me her  
22 impressions of the video.

23 A I don't know. I don't think so, but I  
24 don't know. I don't think it's very clear.

25 BY MS. MCGOVERN:

LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Page 104

1 Q Yeah, if -- if you do tell me.

2 A Okay.

3 Q And we'll stop and replay it.

4 On the left, it looks like you can still  
5 see that there's a sock and a shoe on that left foot.

6 Am I correct in that?

7 A That's what it looks like, yes.

8 Q Yeah.

9 So it wouldn't be on the left foot that  
10 you would be looking at any tattoos, right?

11 A Yes, I would agree with that.

12 Q Okay. And at 3:48:36, I think your head  
13 went adjacent, look under the table again. You don't  
14 know what that's about? And then again at 3:48:45,  
15 and then you're back up at 3:48:50. Do you recall  
16 what that was about?

17 A Not specifically, no.

18 Q No, okay.

19 A Uh-huh.

20 Q That's pretty clear.

21 He picks up a sock foot at 3:49:04, and  
22 it looks like he's removing his sock.

23 Do you see that? And I can go back if  
24 you want me to play it again. Do you want me to go  
25 back a minute?



**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 105**

1           A       Sure.

2           Q       **Try not to go back too much. Stop.**

3                   MR. BEGNAUD: Use the ten-second-back  
4       thing.

5                   MS. MCGOVERN: Use that?

6                   THE WITNESS: No, no, but to the left  
7       of the pause line.

8                   MR. BEGNAUD: There's a ten on it.

9                   MS. MCGOVERN: Okay. I messed that  
10       up, sorry.

11                   Which one?

12                   THE WITNESS: It's the --

13                   MS. MCGOVERN: Oh, ten.

14                   MR. BEGNAUD: Ten, yeah. Supposed to  
15       roll back ten seconds.

16                   MS. MCGOVERN: You think that's good,  
17       or should I do one more?

18                   THE WITNESS: Do one more.

19       BY MS. MCGOVERN:

20           Q       **Okay. We went back at 3:49:02.**

21                   **Okay. And there is his left sock on it,**  
22       **looks to me, and he is taking it off.**

23                   **Does that look like that to you, and your**  
24       **head goes down?**

25           A       Yes. Yes, maybe -- yes, maybe it's...

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 106**

1           Q     Okay. And then 3:49:23, he appears to be  
2     rolling his sock up?

3           A     Uh-huh. Yeah, he's putting his socks  
4     back on.

5           Q     And then his left foot at 3:49:30, he's  
6     taking that sock off?

7           A     Uh-huh.

8           Q     And your head is pretty much under the  
9     table completely at that point and one arm is under  
10    the table?

11          A     Well, it's on my chest.

12               MR. BEGNAUD: I disagree.

13          A     My arm is on my chest.

14    BY MS. MCGOVERN:

15          Q     Well, it's certainly not visible. Your  
16    arm is below the surface level of the table, correct?

17          A     That's correct, because my body was.

18          Q     Right.

19               Your whole body and head were, at that  
20    point --

21          A     Yes.

22          Q     -- under the table.

23               And that's not visible to the officer  
24    outside or to the camera what's happening, correct?

25          A     Yes.

1           Q     So security has no way to verify what's  
2     happening at that point because it's not visible on  
3     here, right?

4           A     Yes. That's correct.

5           Q     Okay. And so go back to 3:49:46, and  
6     then he is rolling up his sock on his left-hand side,  
7     correct?

8           A     Uh-huh, yes.

9           Q     And he would -- seemed to be taking a  
10    minute to do that.

11                   And so what is your recollection of what  
12    was going on during those frames we show with him  
13    taking off each sock and then rolling them back up  
14    his foot?

15           A     I mean, I don't remember the complete ins  
16    and outs of this conversation three and a half years  
17    ago, but I remember that we were talking about  
18    tattoos. We were talking about tattoos on his feet.  
19    That's -- that is the general sense of my  
20    recollection of this.

21           Q     And instead of him lifting his foot up to  
22    show you or doing something that would have been line  
23    of sight, why -- why was it done under the table with  
24    you leaning with your arm and head below the surface  
25    of the table?

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 108**

1           A       His -- he was in ankle irons, so he  
2       couldn't -- I mean, he would have had to have, like,  
3       you know --

4           Q       He could have lifted both feet up?

5           A       That would have taken significantly more  
6       effort and not -- not a natural movement compared to  
7       just looking under the table.

8           Q       That may be all I need to -- well, at  
9       3:50, he is doing something with his sock again, it  
10      looks like.

11          A       Uh-huh.

12          Q       Do you recall what he was doing there?  
13      It's somewhat blocked by the camera.

14          A       I don't know.

15          Q       Now he raises his left arm, and it's just  
16      showing at 3:50, it's clear he has a whole lot of  
17      different tattoos on arms and hands. But he didn't  
18      choose to show you those tattoos during the course of  
19      the interview. It was just the ones on his feet?

20          A       I don't remember. I don't remember.

21          Q       How many tattoos did he have on his feet?

22          A       I don't remember.

23          Q       And why was that germane to your case?

24          A       Again, what I remember what -- the  
25      question I remember asking him that prompted talking

1 about his feet was me asking about, you know, what  
2 tattoo had he gotten that, like, hurt the most.

3 Q Okay. I can scoot away now because we're  
4 on the video.

5 All right. Is there anything else that  
6 reviewing that video brings to mind in regards to  
7 looking at his feet, the socks and so on and so  
8 forth, other than what we went through? Did I miss  
9 anything?

10 A No.

11 Q Okay. And you never considered during  
12 the course of that visit that it might not be a good  
13 idea in a high max prison to put your head under the  
14 table and have a convicted murderer take off articles  
15 of clothing to show you his feet?

16 A No, I -- that was not unusual for any of  
17 my clients. That was very standard.

18 Q But -- never mind.

19 Okay. Now, there was a subsequent voice  
20 recording that's been produced in this case. I don't  
21 know if you've heard it or not by Ricky Dubose  
22 indicating that it was necessary to get some -- some  
23 information to lawyers who were going to get him some  
24 stuff that was taken in code.

25 Have you ever listened to any audio

1 recordings of Ricky Dubose in relation to this  
2 particular investigation of the interactions that  
3 you-all had? If you don't know anything about it,  
4 it's fine.

5 A I -- I don't know. I've listened to,  
6 like, a very short amount of an audio recording that  
7 I think Nathan Adkerson did with Ricky --

8 Q Right.

9 A -- about -- my understanding is Ricky had  
10 gone to Warden Morales and had said that he had  
11 information as to, like, a contraband drop, and he  
12 wanted to tell Warden Morales about this. In  
13 exchange, he was hoping to get a visitation approved  
14 with his girlfriend.

15 To be honest, I know that there's an  
16 audio recording. I think I listened to, like, seven  
17 minutes of it, and it's very hard to hear Ricky. And  
18 I was just like, This is why I have an attorney to do  
19 this for me. It was just very hard to hear him, and  
20 I didn't listen to all of it.

21 Q I might need a Wi-Fi here to get to this.  
22 The conference doesn't require a -- okay -- security  
23 key? Well, guys, I'm going to take a break. I had  
24 it pulled up yesterday. I'm going to come back to  
25 that.

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 111**

1                   But you're not recalling a video -- or  
2   I'm sorry, an audio recording Ricky Dubose made  
3   himself on a telephone?

4           A     Oh, no.

5           Q     Yeah, okay.

6                   So as part of your investigation, you  
7   went to see Ricky's family, and you went out of state  
8   a couple of times, right?

9           A     Yes.

10          Q     Tell me about that.

11          A     I'm sorry. I made multiple trips to  
12   Texas. He had family in Texas. I also had two other  
13   cases at the time in which there were family members  
14   in Texas. So I would go to Texas. For a while, I  
15   was going to Texas somewhat regularly and kind of,  
16   like, doing work on all the cases.

17                   He had family in North Carolina. I went  
18   to North Carolina once. His sister was in Alaska,  
19   and the lead attorney on the case and I went to  
20   Alaska once to see her.

21          Q     Who funded the trip to Alaska?

22          A     It was all funded by the capital  
23   defenders office.

24          Q     So what did you learn in the course of  
25   those meetings? Oh, well, I'm not trying to get into

1 any attorney/client privilege there. I mean, were  
2 there mitigation issues --

3 A Yes.

4 Q -- that weren't privileged that --

5 A I can say in kind of general.

6 Q Yeah, yeah.

7 A When talking with -- when meeting with  
8 family, you know -- you know, I'm exploring kind of  
9 cognitive deficits, exploring -- like I said,  
10 intellectual functioning is always something that  
11 we're exploring in every capital case, and that was  
12 something that we explored a lot with -- with Ricky.  
13 So it was a lot of conversations with family members  
14 about how -- how well he could -- he could function,  
15 communication skills, you know, we talked to family  
16 about -- a lot of clients have histories of abuse and  
17 neglect and growing up in poverty and, you know,  
18 talking to family collaterals can be extremely  
19 important to uncovering information about that.

20 Q How much time did you spend with, say,  
21 his mother?

22 A Hardly any. None.

23 Q Hardly any or none?

24 A I -- I showed up -- so at one point, I  
25 knew (inaudible), who, as I said, is the director of



**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 113**

1 mitigation who worked on this case as well. She and  
2 Amber Pittman, who's a lead attorney, met with  
3 Ricky's mother. And for various reasons, Ricky's mom  
4 did not want to engage with us as a defense team for  
5 many years. So I would attempt to contact her. I  
6 would attempt to call her or, you know, knock on her  
7 door, and, you know, she would tell me that she  
8 didn't want to speak with me. So I had very little  
9 contact with her.

10 Q Okay. So you're aware that after the --  
11 after the arrest and when the media published that  
12 there were a variety of Facebook posts --

13 A Uh-huh.

14 Q -- that went up including -- I assume  
15 you're aware there were Facebook posts by family  
16 members that --

17 A Uh-huh.

18 Q -- had comments about they thought you  
19 were in love with him.

20 Do you have any understanding as to why  
21 they would make such comments based on what  
22 interactions you did or did not have with them?

23 A I can give you my guess.

24 Q Sure. Of course.

25 A You know, I don't know for sure what they

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 114**

1     were thinking. The young woman who made that  
2     comment, if I remember correctly, she was Ricky's  
3     cousin. She lived in Texas. And when she was --  
4     when she was younger, she had lived in Georgia and  
5     had lived near the Dubose family in Georgia when  
6     Ricky was very young. And so, you know, I spent a  
7     lot of time on this case really wanting to talk to  
8     cousins, aunts, uncles, other people because his  
9     mother was not a source of information. So I spent a  
10    lot of time looking elsewhere. And his father was  
11    also not a very strong source of information for  
12    various reasons. So I spent a lot of time with more  
13    extended relatives.

14               I remember going out to Texas -- and I  
15    was persistent. I was very persistent. That is --  
16    that is part of the job. And we were -- we were  
17    trained, and, you know, if people tell you no, you  
18    come back around later and you try again.

19               I went to Texas once for a trip. Like I  
20    said, I was doing work on multiple cases on that  
21    trip. I wanted to speak with this cousin  
22    particularly because I had this sense that she seemed  
23    a little bit more stable than some of the other  
24    family members. I knew that she was around Ricky  
25    when he was young, and I was hoping that she could

1 give me some information as to what the home life was  
2 like.

3 And I remember she had agreed to an  
4 appointment with me. We had set, like, a time and  
5 place, and, you know, everything was good, and then  
6 she just kind of ghosted me. And, you know, I was --  
7 she would -- just kind of stopped responding to my  
8 calls and my texts, and, you know, I would try to  
9 say, Okay, see you tomorrow, and there was just  
10 nothing.

11 So I was like, All right, well, I'll just  
12 try again another day. And the next time I went out  
13 to Texas, you know, a couple of months later, perhaps  
14 I attempted to meet with her again. And we did meet.  
15 You know, I had to really be persistent, but we -- I  
16 remember we met at a -- like, a public park. And we  
17 had -- you know, she was -- she was open, and she  
18 was -- she was -- you know, it was a good interview.

19 My experience with a lot of criminal  
20 defendants and especially capital defendants is that  
21 their families are very defensive. Their families  
22 really feel like their person has -- you know, their  
23 family member, the -- you know, my client has often  
24 been very demonized in the news rightfully so  
25 potentially. You know, they, themselves, have

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 116**

1 potentially had backlash themselves in their  
2 community about, you know, being a family member to  
3 this person. And so they can be -- they can be very  
4 defensive. And I try to make it very clear from the  
5 get-go, I'm on your -- you know, your brother, your  
6 husband, your father, your sister, your mother,  
7 whoever my client is, I'm on their side. I'm helping  
8 them. I understand that they're facing these  
9 allegations. You know, I don't -- I don't think that  
10 they're a horrible person the way that they've been  
11 shown, perhaps. And, you know, you have great  
12 memories of them. I want to hear those memories, and  
13 I believe in those memories. You know, someone can  
14 have killed people and yet also be a loving brother.

15 And so I always try to make that very  
16 clear with them people, like you have positive  
17 memories of this person, I believe that. I believe  
18 that. And I want to hear these memories. I'm not  
19 here to attack your loved one. I'm not here to  
20 disparage them.

21 So my impression with his cousin, my  
22 guess -- like I said, I don't know what was going on  
23 in her head but perhaps the fact that I was so  
24 persistent in trying to meet with her over several  
25 months. And I think that she just -- you know, she

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 117**

1 didn't understand a whole lot of how defense teams  
2 work. And maybe she just -- you know, I made it very  
3 clear, I'm here on behalf of, you know, your cousin,  
4 and we're -- we're going to do everything we can to  
5 help him. And, you know, I'm a young woman, and  
6 people just think inappropriate things about young  
7 professional women sometimes. That is my guess, but  
8 I don't know for sure.

9 Q So when you were communicating with  
10 Ricky, I know there was a court order that allowed  
11 you-all visitation. I assume you used work e-mail to  
12 communicate with him.

13 Was that one way that you communicated  
14 with Ricky directly?

15 A No.

16 Q Okay.

17 A He didn't -- he didn't have any e-mail  
18 access.

19 Q Okay. Telephone calls, did you have any  
20 telephone calls?

21 A We would occasionally set up phone calls,  
22 yes.

23 Q Did he ever utilize a cell phone which is  
24 contraband, but did he ever utilize one to -- he  
25 obviously had access to one at certain points in

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 118**

1 time -- to contact you in that manner, by text or  
2 phone?

3 A Not that I remember remotely, no.

4 Q So it's my understanding that you got a  
5 JPay account --

6 A Uh-huh.

7 Q -- to communicate with him.

8 Why was that done?

9 A That was done because there were a few  
10 instances in which we had a court meeting set up,  
11 like a court hearing set up or someone on the team --  
12 we all kind of rotated, so there was someone from the  
13 team going out to see him pretty regularly -- was  
14 supposed to see him, and he knew that. He knew --  
15 maybe he knew when someone was supposed to come, or  
16 he knew that there was supposed to be a court hearing  
17 on, you know, July 27th, for example, and it would  
18 get cancelled last minute for whatever reason.

19 He would have a lot of anxiety as to not  
20 knowing what was going on. Why is it cancelled,  
21 someone was supposed to be out here to see me today  
22 and no one's here today, what's going on. And so I  
23 set up the JPay account at the direction of Amber  
24 Pittman, the lead attorney, so that we could have  
25 kind of a quicker way to just message him and say,

1 you know, Court's cancelled, or so-and-so will be out  
2 there to see you next week on this day. So someone's  
3 coming, you know, don't stress.

4 Q Were any of the attorneys using JPay?

5 A I think it was just -- I think I just did  
6 all the communication for everybody, is my memory.

7 Q Okay. You were the one who set up the  
8 JPay account?

9 A Yes.

10 Q And you're aware that JPay is not just  
11 for e-mail but also for payments to inmates?

12 A Yes.

13 Q Okay. Did you ever make any payments on  
14 his behalf or commissary or anything along those  
15 lines?

16 A I don't remember. I don't think so. I  
17 don't think so. I don't remember.

18 Q It's possible that you did and you don't  
19 recall?

20 A It's possible I did once or twice. The  
21 capital defenders office, the practice was if, for  
22 some reason, we felt the need to put money on an  
23 inmate's books, I wasn't -- we were not being paid  
24 very much and, you know, neither were the attorneys,  
25 but they were certainly being paid more than the

1 investigators.

2 And so kind of the practice there was if  
3 something was going on and we felt the need to put  
4 money on an inmate's books, usually, the attorney  
5 would do that. I frankly don't remember ever putting  
6 money on an attorney's books the whole time I was at  
7 the capital defenders office, but I can't promise  
8 that I never did. I do know attorneys in my cases  
9 that would do that.

10 Q Okay. And if you have a JPay account,  
11 you can utilize it either way for e-mail or money?

12 A Right.

13 Q Okay. With other -- in other cases that  
14 you handled, did you put that money on the books for  
15 the inmates?

16 A Then I don't remember that at all.

17 Q Okay.

18 A I don't remember that, no.

19 Q Sure.

20 Okay. We talked for a moment about the  
21 media issue and the Facebook and everything that came  
22 out after that.

23 Now, sitting here today, you don't have  
24 any knowledge or information indicating that Nathan  
25 Adkerson had anything to do with the media being



1 present at the time you were arrested, do you?

2 A I don't know who had -- who set that up.

3 I don't know.

4 Q Okay. You don't have any evidence or  
5 knowledge. I mean, someone did, but you don't know  
6 who it is. Is that fair?

7 A Correct.

8 Q Okay. And there was subsequent coverage  
9 indicating the charges were dropped as well, correct?

10 A Correct.

11 Q So to the extent it was in the media you  
12 were arrested, it was also in the media when the  
13 charges were dropped?

14 A That's correct.

15 Q Okay.

16 MS. MCGOVERN: So are you doing okay?  
17 Need a break? Want to take a five-minute  
18 break?

19 THE WITNESS: Thanks for asking. I'm  
20 okay. I do definitely need some lunch at  
21 some point in my life, but not -- it  
22 doesn't have to be for -- you know,  
23 1:00 o'clock, maybe.

24 MS. MCGOVERN: Let's go off the record  
25 real quick.

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 122**

1                   THE VIDEOGRAPHER: This is the end of  
2                   Media 1. The time is 12:46 p.m. We're now  
3                   off the record.

4                   (Whereupon, the video camera was  
5                   turned off.)

6                   (Whereupon, a brief recess was taken.)

7                   (Whereupon, the video camera was  
8                   turned on.)

9                   THE VIDEOGRAPHER: This is the  
10                  beginning of Media 2. The time is  
11                  12:53 p.m. We're back on record.

12                  (Whereupon, Exhibit No. 1 was marked for  
13                  identification by the court reporter.)

14                  BY MS. MCGOVERN:

15                  Q     All right. We're going to try to finish  
16                  up here. As a matter of housekeeping, I'm going to  
17                  go ahead and mark but retain the copy of the video  
18                  that was utilized as Defendant's Exhibit 1.

19                  (Whereupon, Exhibit No. 2 was marked for  
20                  identification by the court reporter.)

21                  BY MS. MCGOVERN:

22                  Q     And then I am now going to show you, as  
23                  we finish up discussing JPay, what I've marked as  
24                  Defense Exhibit 2. Sorry, I don't have an extra  
25                  copy, but if you and your attorney want to look that

1 over, just the text of that real quick, and I'm just  
2 going to ask you a quick question.

3 A Okay.

4 Q And so do you remember receiving this  
5 communication by JPay e-mail from Ricky Dubose?

6 A Yes.

7 Q And I'll read it since we've got a lot of  
8 people online. And I don't think I have a Bates  
9 number for you guys on Zoom, but essentially, he's  
10 writing to you and asking about your trip to visit  
11 (inaudible), how was your trip. And says, Oh, I have  
12 a ring for you too, smiley face, smiley face. Let me  
13 know if you get this, please.

14 A Uh-huh.

15 Q So what ring was he talking about?

16 A So Ricky had -- I don't know who did  
17 this. Another inmate at that facility would make  
18 little, I don't know, jewelry pieces accessories and  
19 give them to the other inmates there. And he had  
20 made several, is my understanding, little jewelry  
21 items for Ricky. You know, it's like facilities have  
22 their underground marketplaces, so to speak, I guess.  
23 And Ricky gave me one of these.

24 Q Ricky gave you a ring?

25 A Yes. It's -- it was, like, made of, I

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 124**

1 don't know, some, like, fabric, almost, like beaded  
2 fabric, maybe. I don't -- I don't know exactly what  
3 the material was. It was pretty -- what's the word  
4 I'm looking for? You know, it's not like a  
5 sophisticated piece of, you know, making.

6 Q It wasn't metal?

7 A No.

8 Q Do you still have it?

9 A I do.

10 Q Can you provide at least a photograph of  
11 it to your counsel if not the actual item for  
12 examination?

13 A Sure.

14 Q What was your understanding of why Ricky  
15 was giving you a piece of jewelry?

16 A You know, I think that it was not  
17 uncommon, it still is not for many of my clients to  
18 send, you know, pictures to members of their defense  
19 team that they draw and, you know, try to give us  
20 little gifts and mementoes of their appreciation.  
21 You know, we -- Ricky had a team of like five people,  
22 I think. And we were the only people who he really  
23 interacted with for many years. You know, we were  
24 doing a lot of work for him for free, meaning no cost  
25 to him, and he was aware of that. And he was

1 honestly one of the more polite and respectful  
2 clients I've had. He was very appreciative.

3 And I think that he just -- he wanted  
4 to -- you know, he wanted to give me something that  
5 was a token of his appreciation for what we were  
6 doing for him.

7 Q A ring appears to have a little bit more  
8 significance than just your standard piece of art or  
9 something along those lines.

10 Did it seem in any way inappropriate to  
11 be accepting a ring from someone you were working for  
12 professionally in this capacity?

13 A You know, it was unusual. It was  
14 unusual, but, you know, I think he didn't make it  
15 himself. My impression was he told this other inmate  
16 who was making different items like, Make  
17 something -- can you make something for Lily? I know  
18 that he talked about all of us to other people  
19 because he would kind of tell us that he would, you  
20 know, talk about all of us to other people. And I  
21 don't know if it was Ricky's idea for it to be a ring  
22 or if that's just what this other person made. I  
23 don't know.

24 Q But he chose to give you a ring, not a  
25 friendship bracelet, not a piece of art. He chose to

1 give you a ring and noted it in an e-mail that he  
2 was --

3 A Uh-huh.

4 Q -- with smiley faces about giving it to  
5 you, right?

6 A That's correct. He did -- and he did  
7 give me art as well at other times like, you know...

8 Q Has any other client that you've worked  
9 with given you a ring?

10 A No.

11 Q And this didn't cause any concern or  
12 suspicion with you?

13 A No. No.

14 Q So I want to go ahead and move on to  
15 November 6, 2019, and the visit that then led to the  
16 arrest. So why don't you walk me through that day as  
17 you went to go visit Ricky, and we'll move through  
18 that.

19 A Uh-huh.

20 I had a morning visit, so I would usually  
21 schedule mornings visits for 9:00 o'clock. It was  
22 always a while before I could get back there to see  
23 him, so I probably wasn't back there to see him until  
24 like 9:30. I don't remember one whole -- I -- I'm  
25 trying to think of, like, the content of that visit.

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 127**

1 I don't remember a whole lot. I remember some. And,  
2 you know, it was a standard run of the mill visit,  
3 like -- like, all of the ones I had with him.

4 And when I was leaving, I went out to  
5 kind of that lobby area that I mentioned to you in  
6 the main facility, and there's a door that's, you  
7 know, obviously locked. And it's like a -- mostly  
8 glass, from what I remember, so you can, like, look  
9 through and see.

10 And I remember standing there for a  
11 while. You know, usually, I would maybe have to  
12 stand for a few seconds or something, and then the  
13 officer doing the door keys would unlock it. And I  
14 remember standing there for quite a while and  
15 wondering, like, What's going on? Maybe they're in  
16 the bathroom. Like, make -- maybe, you know, they're  
17 having -- something came up, and they're just not  
18 paying attention that, you know, they need to unlock  
19 this door.

20 And so I was standing there for a while,  
21 and then I noticed some people -- and I'm sorry --  
22 you know, outside from that standalone security area  
23 coming up the path to come into the main facility  
24 where I was. Now I know it was Nathan Adkerson with  
25 two other officers with him. And I thought, Oh, this

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 128**

1 is -- this is good. When they come in, the door will  
2 open, and I'll be able to go out.

3 But when they -- when they got there,  
4 Nathan Adkerson said, Step aside, Ms. Engleman. And  
5 I remember being very shocked that he knew my name.  
6 I'd never seen him before, had no idea who he was.  
7 And so I kind of moved aside with them, and he told  
8 me that he had an arrest warrant for contraband,  
9 which, I'm sorry, I just still think it's so  
10 ludicrous.

11 And so we -- we talked there in the  
12 facility for 20 minutes, maybe. We talked in the  
13 facility. We went outside. He handcuffed me there.

**14 Q Outside or inside?**

**15 A** Inside.

16 He handcuffed me inside, and I was very  
17 concerned about my case notebook and, you know,  
18 retaining possession of that. I was very concerned  
19 about all of this being utilized in a way for prison  
20 officials or other people to, like, learn privileged  
21 information about Ricky.

22 So, you know, he handcuffed me there. I  
23 was able to still kind of retain possession of my  
24 case notebook. We went outside to the parking lot.  
25 I was in an agency vehicle. They searched the



**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 129**

1 vehicle. And he explained to me that we had to wait  
2 there for a while because an officer from the Butts  
3 County Sheriff's Department had to come, and that was  
4 quite a ways away. Like, it was the town of Jackson  
5 is, I don't know, 15 minutes away from the facility,  
6 I think.

7 So we had to wait a while for a sheriff's  
8 officer to come. Mr. Adkerson explained, you know,  
9 that I would be going to -- you know, being booked in  
10 the sheriff's department and such. And yeah, that's  
11 what happened. The sheriff's officer came and got in  
12 the car, and we went to the sheriff's department.  
13 And there it was when I saw the media at the  
14 sheriff's department.

15 Q Okay. So let me back up for just a  
16 minute.

17 You say you talked with Nathan for about  
18 20 minutes.

19 What was discussed during that  
20 20 minutes?

21 A So he -- you know, he explained that he  
22 had this arrest warrant. He explained that he had  
23 been recording -- they had been recording and  
24 watching legal visits. So I was shocked and frankly  
25 scared because I thought that's not supposed to be

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 130**

1   happening, like what are these people doing here.  
2   That is -- that is not supposed to be happening. And  
3   it felt like they were playing -- it felt like they  
4   were playing a game, that I wasn't really sure what  
5   the rules were, because I was like, that's not  
6   supposed to be happening. And I know I did not give  
7   my client contraband. I also knew that Ricky was  
8   strip searched after every single legal visit.

9               So it felt like they were -- I was just  
10   very scared about what they were doing. And, you  
11   know, he told me that he watched this video in which  
12   I gave something -- I passed something blue to Ricky.

13              And I remember just being, like, so  
14   dumbfounded and saying something like, Was I picking,  
15   like, lint off my shirt and maybe just, like, you  
16   know, on the table or on the ground, like getting  
17   lint off my shirt? Like, what are you talking about?

18              And he's like, No, it's not lint. And,  
19   you know, he said several times, You're going to be  
20   booked into the Butts County Sheriff's Department,  
21   and then I want to sit down and talk to you about  
22   what happened.

23              And that, of course -- I was like, Do you  
24   think -- it felt to me at the moment like they were  
25   just, like, manufacturing -- I'm not saying that

1 that's -- you know, I don't know what their motives  
2 were. But it felt to me in the moment that they were  
3 manufacturing this arrest and the attempt to scare me  
4 so that they could get me in a room alone and get me  
5 to tell them privileged information about my client.  
6 And I was, like, offended that he thought I would  
7 maybe do that.

8 Q Did he ever ask you for privileged  
9 communications?

10 A Well, he said, I want to sit down and  
11 talk to you about what's going on with Ricky, yeah.

12 And I kept telling him, I'm not going  
13 to -- I'm not going to talk to you about my client.

14 Q When he was talking to you about  
15 contraband and saying he wanted to talk to you about  
16 what was going on, did he ever say, I want your  
17 privileged communications about your case with Ricky?

18 A No, but any of my communications with my  
19 client are privileged, any of my -- so, you know, I  
20 don't know how he could talk to me about my client  
21 without me divulging privileged information.

22 Q Even though he was talking to you about  
23 this contraband issue and what he saw on a video that  
24 had nothing to do with verbal communications? You  
25 were assuming he wanted your --

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 132**

1           A       I --

2           Q       -- privileged information?

3           A       I don't -- I don't think that there's any  
4 way for me to talk about my meetings with my client  
5 without talking about what would be privileged  
6 information. At that moment, I did not see how that  
7 was possible. And it would be --

8           Q       That was your assumption, though?

9           A       Yes. And it would be incredibly  
10 inappropriate of me to talk to anybody about Ricky  
11 Dubose without his lead attorney being there. So,  
12 you know, he said that many times. And I kept saying  
13 as politely as I could, I'm not going to talk to you  
14 without Ricky's attorney there, without someone  
15 representing me there. Like, why would I -- why  
16 would I ever do that?

17                   So that was mostly it. I remember one of  
18 the female officers, I think, kind of patted me down.  
19 That's mostly what I remember talking to him about.

20           Q       Okay. So you said that you knew for a  
21 fact that Dubose was strip searched after every  
22 visit.

23                   What documents have you reviewed, and  
24 what witnesses have you gathered that information  
25 from?

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 133**

1           A       I feel -- I just want to be careful with  
2 my answer because I feel like that's information I  
3 know about that was received pursuant to a protective  
4 order. So I just want to be careful about that.

5                   MR. BEGNAUD: Do you want to --

6 BY MS. MCGOVERN:

7           Q       My question, though, was very carefully  
8 put.

9           A       Okay.

10          Q       What documents did you review that  
11 demonstrate there was a strip search after every time  
12 he saw you? I don't mean court documents. I mean  
13 prison documents demonstrating there was --

14          A       Yeah.

15          Q       -- a strip search.

16          A       Yes, but we received those documents  
17 pursuant to a protective order.

18                   MR. BEGNAUD: I think we should  
19 probably go off the record. There's a  
20 protective order you're not aware of.

21                   MS. MCGOVERN: Okay. That would  
22 encompass that?

23                   THE WITNESS: Yes.

24                   MR. BEGNAUD: Do you want to go off  
25 the record?

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

**Page 134**

1 MS. MCGOVERN: Yeah.

2 THE VIDEOGRAPHER: The time is

3 1:07 p.m. We're now off the record.

4 (Whereupon, the video camera was  
5 turned off.)

6 (Whereupon, a brief recess was taken.)

7 (Whereupon, the video camera was  
8 turned on.)

9 THE VIDEOGRAPHER: The time is  
10 1:10 p.m. We're back on the record.

11 BY MS. MCGOVERN:

12 Q You didn't personally observe Ricky  
13 Dubose being strip searched after each visit, did  
14 you?

15 A No.

16 Q You weren't personally present to have  
17 firsthand knowledge about whether or not that  
18 occurred, correct?

19 A That's correct.

20 Q Okay. In terms of the videos of the  
21 communications, we talked about that earlier in your  
22 testimony. But you knew there was a video camera in  
23 the room, and you did not ask if it was recording or  
24 not, correct?

25 A That's correct. It never occurred to me

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 135**

1     that it would be recording.

2           Q     So there's a video camera in a room in a  
3     prison, and it never occurred to you that the video  
4     camera in a prison would be recording?

5           A     Not for a legal visit, no.

6           Q     Okay. And you don't have knowledge who  
7     was in charge of that video camera working there,  
8     whether it had to do with Warden Morales and the  
9     people at Jackson State Prison versus anyone at OPS.  
10    I think we talked about that earlier.

11          A     Yes, I don't have knowledge.

12          Q     All right. And so you said that you had  
13    this conversation with Mr. Adkerson, and he said he  
14    wanted to talk to you, but he was -- wasn't he  
15    referencing the contraband issue and what he believed  
16    to be an exchange of contraband that he wanted to  
17    talk to you about?

18          A     Yes.

19          Q     Okay. Now, they went and searched  
20    your -- it was him and you said there were two  
21    officers with him?

22          A     Two -- yes, two female officers. I think  
23    that there were also OPS agents with him. And I'm so  
24    sorry, but I don't quite remember their names.

25          Q     Sure.

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 136**

1                   And I think one might have been Ms. Moss?

2           A       Yes.

3           Q       Okay. All right. But they were not the  
4 Butts County sheriff officers?

5           A       That's correct.

6           Q       Correct.

7                   And they went and searched your vehicle,  
8 and then there was discussion about your phone as  
9 well and what to do with that because of privileged  
10 information, wasn't there?

11          A       Yes.

12          Q       Can you tell me about that?

13          A       Yes.

14                   The capital defenders office did not give  
15 us agency cell phones. You know, we had obviously  
16 desk phones, but we had to use our personal cell  
17 phones for a lot of team communications. You know,  
18 my work e-mail, like I had Outlook app on there, you  
19 know, that had all my work e-mail was to there and  
20 tons of text messages with not just the Dubose team  
21 but, you know, members from all the other teams I was  
22 on.

23          Q       So ultimately, what happened that day in  
24 terms of your phone?

25          A       They took it. They said that they were



1 going to get a search -- a search warrant for it. I  
2 explained many times over that I was very concerned  
3 because there was a lot of privileged information on  
4 the phone. Mr. Adkerson assured me that he would get  
5 a search warrant, everything would be fine, and I  
6 would get the phone back in about three days.

7 And I remember thinking in my head,  
8 That's -- that's not going to happen. I mean, I work  
9 in this field. It's like I knew that what was going  
10 to happen was my agency was going to litigate that.  
11 They were going to try to get a special master to  
12 look at the phone. You know, it wasn't just going to  
13 be a thing of, Let's just get a search warrant and  
14 look at the phone and give the phone back to her. So  
15 I knew that it was going to get tied up in  
16 litigation. And it was. So I -- I -- you know, I  
17 think the phone was released to me like a year later  
18 or something.

19 Q You're aware that Mr. Adkerson is not an  
20 attorney, correct?

21 A Yes.

22 Q And it was returned to you, and it was  
23 ultimately decided not to -- not to search your  
24 phone?

25 A Yes.

LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Page 138

1 Q In communications with your office, the  
2 DA's office and others, correct?

3 A Yes.

4 Q The lawyers decided, correct?

5 A Yes.

6 Q You don't have any knowledge about  
7 Mr. Adkerson's training, experience, background,  
8 expertise or anything along those lines, correct?

9 A Well, I know that he's a law enforcement  
10 officer.

11 Q Right.

12 But beyond that general statement, you  
13 don't have any further knowledge about him, correct?

14 A That's correct.

15 Q So when the Butts County sheriffs came,  
16 they picked you up and took you to the courthouse.  
17 Mr. Adkerson was not with you, correct?

18 A Yeah, that's correct.

19 Q Okay. Was that the last contact that you  
20 had with Mr. Adkerson?

21 A Yes.

22 Q Okay. Was there -- was there subsequent  
23 communications that you're aware of -- and I'm not  
24 asking what they were -- between your attorney, Don  
25 Samuel, and Nathan Adkerson, to your knowledge?

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 139**

1           A       Yes. I think -- I think Don had a phone  
2 conversation with him, you know, within the next week  
3 or so, maybe. I don't know if they talked multiple  
4 times.

5           Q       Okay. So you went.

6                   Where were the media when you arrived at  
7 the Butts County courthouse?

8           A       They were -- so we -- we pulled into the  
9 backside of the sheriff's department. I'm sorry, I  
10 don't know the terminology for these kinds of  
11 buildings, but the -- I don't know, like, their  
12 garage-looking thing. And they were -- they were  
13 right there, like right as I got out of the car.

14          Q       Okay. And have you done any  
15 investigation to try to determine who notified the  
16 media?

17          A       Yes.

18          Q       And what has your investigation yielded?

19          A       I can't figure it out.

20          Q       Oh.

21          A       I don't know.

22          Q       Was your investigation just like looking  
23 online or talking to people or -- and I'm not asking  
24 what your attorney did. I'm asking what you did.

25          A       I mean, we -- the -- we, as a Dubose

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 140**

1 team, I mean, we pulled everybody up on the stand  
2 that we could to ask them.

3 Q Okay. And so you were booked. And then  
4 tell me what happened after that.

5 A I was booked. Mark Winne with Channel 2  
6 news was there to film the whole thing and kind of  
7 pepper me with questions when I wasn't, you know,  
8 actively answering questions of the people. I was --  
9 I was booked in. I was placed in a holding cell. I  
10 was told that the next, like, bond hearing was, like,  
11 at 2:00 o'clock or something and that I was just  
12 going to have to wait until then.

13 At the bond hearing, they took me in, you  
14 know, fully -- fully shackled with the waist chains  
15 and everything, which seemed very excessive to me.  
16 Mark Winne was set up in there as well, filmed it  
17 all. I remember that there were two other defendants  
18 in there as well who seemed, you know, very confused  
19 as to what was going on.

20 I was granted bond. After the hearing,  
21 that was when I was told I could call someone. I was  
22 told I could not call anyone until after the hearing.  
23 It was very strange, in my opinion. I was also told  
24 that I could not bond myself out because I said  
25 that's -- I'll pay the \$5,000, and I was told I

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 141**

1     couldn't -- I couldn't do that. Someone else had to  
2     pay -- I don't know if that's normal or not. To me,  
3     it was just -- seemed really weird.

4                 So I had to call a bail bondsman, and I  
5     called Amber Pittman, who is the lead attorney on the  
6     Dubose team. She had already found out what had  
7     happened because I learned later Mark Winne had  
8     called, like, the media rep or whatever for the  
9     public defender council to ask them what was going  
10    on. They had no idea. But because of that phone  
11    call, you know, it kind of went down the chain of  
12    command within my agency until the capital defenders  
13    office found out what was going on. So Amber was  
14    already on her way.

15                So she got me. And there was another  
16    member of the Dubose team there with her, and we  
17    drove back to the prison to pick up the agency  
18    vehicle that was still there. And then she -- you  
19    know, I had multiple phone conversations on her cell  
20    phone since I didn't have mine with the director of  
21    the capital defenders office, who, you know, they had  
22    no idea what was going on. And he just said, We have  
23    no idea what's going on. Come into the office  
24    tomorrow. We'll talk about this, you know. And she  
25    drove me to a MARTA station, and I took MARTA home.

1           Q     All right. And then subsequently, there  
2     was an arraignment, and then after that, there were  
3     discussions with your criminal attorney and DA Adams,  
4     and the charges were ultimately dropped; is that  
5     correct?

6           A     That's correct, about a year and a half  
7     later.

8           Q     Okay. And if some of the other folks who  
9     want to ask questions more about that, I'll pass the  
10    buck to them.

11          A     Sure.

12          Q     So in terms of damages you've  
13    experienced -- we've talked a lot about your work  
14    history and how that went and progressed. And your  
15    attorney is going to get me the financials so we  
16    can -- we don't need to go further into that.

17                You have made claim about mental health  
18    issues as a result. So first, I want to ask about  
19    what -- who you're treating with, if you're still  
20    treating with them, and what you're treating for.

21          A     No, I'm not currently seeing a mental  
22    health provider. I saw LPC Lauren Alexander in  
23    2020 -- 2020, I think it was. Yes, 2020.

24          Q     For how long?

25          A     I actually didn't see her for too long.

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 143**

1 It was a few months. I don't remember exactly how --  
2 how long that was, yes.

3 Q Okay. And did she prescribe any  
4 medications?

5 A No. She can't -- I mean, she's an LPC.

6 Q Okay.

7 A So she can't prescribe meds. She  
8 recommended that I consult a psychiatrist, I go to a  
9 psychiatrist. She thought that anxiety medication  
10 would be really beneficial. For various personal  
11 reasons, I -- I didn't really want to do that. So I  
12 didn't do that.

13 Q Okay. You said you see a psychiatrist.  
14 Who's that?

15 A No, I don't.

16 Q Oh, you don't, okay.

17 A I said that she recommended --

18 Q Okay.

19 A -- I see a psychiatrist --

20 Q Okay.

21 A -- to get on antianxiety meds, but I  
22 didn't want to do that.

23 Q Have you, at any point in your life, been  
24 on any mental health medications?

25 A No, which is why I didn't really want to.

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

**Page 144**

1           Q     Okay. Sure.

2                     And so you had essentially therapy  
3 with --

4           A     Yes.

5           Q     -- with Lauren Alexander for a few  
6 months?

7           A     Yes.

8           Q     And did she give you any diagnoses?

9           A     I don't know what diagnoses is on, like,  
10 her -- her billing paperwork because that's kind of,  
11 like, diagnoses, primarily, is for, a lot of times,  
12 the mental health world is so you can bill -- you  
13 have to have a diagnosis to bill. So I don't know  
14 what she put down. She told me informally, you know,  
15 in a session, she said it -- you know, This is  
16 obvious- -- obviously like very high anxiety, and  
17 you're displaying a lot of PTSD symptoms. I don't  
18 know if that's a formal diagnosis that she put down  
19 for billing purposes. I haven't seen the records.

20          Q     Okay. So you don't have a formal  
21 diagnosis that you know of for PTSD?

22          A     That's correct.

23          Q     Okay. And any other diagnosis that she  
24 gave you that you're aware of?

25          A     Right. I actually never saw paperwork.



1           Q     Okay. All right. Any other mental  
2 health ramifications, issues, problems that you  
3 experienced as a result of this incident for which  
4 you're claiming damages in this case? For example, I  
5 think you mentioned insomnia in your discovery  
6 responses.

7           A     Yeah, I'm just trying to think of how to  
8 answer this because it feels very broad.

9           Q     It is. It's kind of to give you your  
10 chance to -- to tell me what's not just in the  
11 medical records --

12          A     Right. Right.

13          Q     -- and the financial documents.

14          A     Yeah. You know, I -- for a long period  
15 of time, there is very -- what I would call, like,  
16 very acute and longstanding depression, because, you  
17 know, at the time, this was -- it was incredibly  
18 destabilizing, and it just came out of nowhere. It  
19 was completely not something I could have predicted  
20 would have happened to me. And, you know, to  
21 immediately be placed -- I was immediately placed on  
22 administrative leave, which I understand, you know,  
23 why that happened, but I -- I've never been under  
24 criminal prosecution before. And I think I did not  
25 have a proper understanding of how horrifically

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 146**

1 stressful it is to be under a criminal prosecution  
2 when you're innocent and you haven't -- and you feel  
3 like these people are coming after me and I haven't  
4 done anything. And it really kind of takes away so  
5 much that you have worked hard for in your life.

6           It was very -- it was very hard to -- you  
7 know, I'm thinking about in the immediate aftermath  
8 when I was on administrative leave for those  
9 three months. It was -- it was very challenging to  
10 wake up every day because I didn't have -- I don't  
11 want to say, like, I didn't have anything to do, but  
12 it's, like, I would wake up and be, like, I'm not  
13 doing what I'm supposed to be doing, which is going  
14 into my work and my job because of this situation and  
15 not knowing how it was going to turn out was -- it  
16 was frankly terrifying. And especially because I  
17 understand that this is just my perception -- and I'm  
18 not saying that this is reality, per se, but my  
19 perception was that I had been targeted as a member  
20 of his defense team.

21           You know, I had serious doubts that they  
22 actually thought I had really done this. I thought  
23 that this was very kind of manufactured at the time.  
24 And so it seemed it was very scary for me because I  
25 felt like -- it felt like these, like, forces larger

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 147**

1     than me were coming in and ripping my life apart.  
2     You know, which is why I said I started working at  
3     the Wing Factory just to kind of give myself  
4     something to preoccupy myself with.

5                 When I started going back to work in  
6     mid-February, I remember when I first got that call  
7     that they were bringing me back, I was elated, of  
8     course. And then the next day just terrified and,  
9     like, overwhelming anxiety because it was -- it was,  
10    like, suddenly, I realized I'm going back into this  
11    environment, like my -- my -- my position is a  
12    mitigation specialist with this agency working on  
13    capital defense, like, could not keep me safe. And  
14    now I'm voluntarily going back? Like, what if this  
15    happens again?

16                It was very -- that's when the more to,  
17    like, PTSD-type symptoms started occurring, was at  
18    that point. I did not go out into the field for a  
19    few weeks. I would just kind of go to the office and  
20    do office work, and I struggled with that. It felt  
21    like this -- this job that I loved so deeply suddenly  
22    felt extremely unsafe to me. But I also felt like I  
23    hadn't been working my cases for three months, like  
24    there's been no mitigation specialist on my case. I  
25    had other cases, you know, outside of Ricky's case,

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 148**

1 and those cases were just -- there was no mitigation  
2 doing -- you know, specialist doing any work on those  
3 cases. I felt a lot of internal pressure to get back  
4 out there and try to -- try to do my job.

5 So I remember I started going to -- I had  
6 a client based out of Augusta. He was incarcerated  
7 in the county jail in Augusta. I wouldn't go there.  
8 I did not feel comfortable going to correctional  
9 facilities. But there were, you know, just  
10 collateral witnesses to interview in the Augusta  
11 area. And I remember thinking, Okay, I could maybe  
12 go and do that. I won't go to a correctional  
13 facility. I think that I can handle, you know,  
14 talking to some school teachers in Augusta. Excuse  
15 me.

16 And that was -- that did not go well.  
17 And I remember just, like, paralyzing anxiety and  
18 fear just about being out doing this job, and -- and  
19 that was when I decided that I needed to get help.  
20 That was when I -- like, I called my employee  
21 assistance program, you know, from that hotel room in  
22 Augusta, and they hooked me up with Lauren Alexander.

23 So she was great. She was really good.  
24 It was -- I think that she -- I think she did a  
25 really good job of, you know, teaching me, like,

1 anxiety-coping skills. And that was also around the  
2 time that the pandemic was happening.

3           So the -- what am I trying to say,  
4 everything kind of shut down. And I wasn't going out  
5 into the field anymore because of COVID. We were  
6 working remotely because of -- because of COVID. And  
7 during that summer, this was the summer of 2020, I  
8 started feeling a little bit more stable in terms of  
9 what was going on with the anxiety issues. But there  
10 was in terms of, like, my job being able to go out  
11 into the field, being able to go to correctional  
12 facilities because I just wasn't. And so if you're  
13 not doing something, you know, that's a nice way to  
14 feel okay about it, I guess.

15           But it was really terrifying knowing that  
16 this criminal prosecution was still going on. In  
17 November, I found out that I was -- had been  
18 indicted. It was an absolute shock to me. I didn't  
19 understand how a grand jury can indict me on a video  
20 that I knew didn't show anything. And I think that  
21 it kind of, for me -- at least, again, my perception  
22 reinforced this idea that it -- it just felt like it  
23 was a shady process. And that was, again, scary for  
24 me to be in.

25           You know, immediately following the

1 indictment, my -- my huge concern suddenly became my  
2 job security. And Omotayo Alli made it very clear  
3 that, you know, even though she moved me to that  
4 other agency, the office of the mental health  
5 advocate, that she -- she made it very clear that she  
6 did not like the situation and that she, you know,  
7 would be happy with me just not there at all. And  
8 that is, of course, eventually what happened  
9 two months later.

10 It's very scary to be under a felony  
11 indictment because of work that you do for an agency  
12 and then have that agency terminate you because I  
13 knew no one else was going to hire me, which is what  
14 I was saying earlier when I said I felt very betrayed  
15 by them. They knew that. They knew that. And it  
16 was -- you know, I have bills to pay. It was -- it  
17 was very scary, and it was very depressing.

18 It was a very hard place to be in until I  
19 got the job I'm currently in, which happened a year  
20 ago. It felt like, you know, I went into significant  
21 debt. It felt like -- it's hard to explain, but it  
22 felt like I was on this train, and I wasn't the  
23 conductor. It was, like, my own life. And these  
24 other people who didn't care about me who had no  
25 concern for my well-being were, like, driving the

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 151**

1 train, and I couldn't get off. And it was just -- it  
2 was just going. And I was doing everything I could  
3 to try to, like, make money for myself and have a  
4 professional life and, you know, move forward with  
5 these. And I just -- it was -- it was very hard. It  
6 was very hard.

7 MS. MCGOVERN: I'm not going to have  
8 any further questions, but do you want to  
9 break before we have the other counsel to  
10 the extent they have any?

11 MR. BEGNAUD: Thanks.

12 MS. MCGOVERN: And thank you. But  
13 yeah, please feel free to take a  
14 five-minute break.

15 THE VIDEOGRAPHER: The time is  
16 1:33 p.m. We're now off the record.

17 (Whereupon, the video camera was  
18 turned off.)

19 (Whereupon, a brief recess was taken.)

20 (Whereupon, the video camera was  
21 turned on.)

22 THE VIDEOGRAPHER: The time is  
23 1:40 p.m. We're back on the record.

24 EXAMINATION

25 BY MR. COLE:

1 Q Ms. Engleman, my name is Chuck Cole.

2 There are a number of defendants in this case, and my  
3 client is Mike Riley.

4 Do you know who Mike Riley is?

5 A No. I definitely never met him --

6 Q Okay.

7 A -- to my knowledge.

8 Q All right. I'll be very brief. But I  
9 want to talk to you about the conference room where  
10 this meeting occurred that was videotaped on  
11 September 6th of 2019, this meeting between you and  
12 Mr. Dubose.

13 Did I understand you to say that there  
14 was a security guard or officer of some sort outside  
15 of the meeting room?

16 A Yes.

17 Q And this meeting room had glass walls,  
18 correct?

19 A To be honest, I don't remember if the  
20 wall was completely glass or if it was a mix. I  
21 think it was a mix. But it was -- it was more  
22 visible than some other correctional facilities I've  
23 been to in terms of how much glass was there. I do  
24 remember that.

25 Q During -- during that meeting on



1 September 6th of 2019 with Mr. Dubose, do you recall  
2 being able to see the security officer or the  
3 security guard?

4 A I -- I don't remember particularly, but I  
5 do remember that when I would be there -- you know, I  
6 could just kind of move my chair, kind of look at  
7 them, because sometimes they might indicate to us if  
8 there were, like, another officer coming to relieve  
9 them or something like that. You know, I would  
10 motion to them if we were finished or things like  
11 that. So I could kind of lean back and see them, but  
12 I don't remember sitting, like, right there, if I  
13 could just -- I don't remember.

14 Q Okay.

15 A Yeah.

16 Q But on -- on September 6th of 2019, you  
17 remember making eye contact with the security guard  
18 or the security officer during your meeting with  
19 Mr. Dubose?

20 A I don't remember.

21 Q I'll ask it more generally.

22 Generally, when you met with Mr. Dubose,  
23 do you recall that you would make eye contact with  
24 the security guard or the security officer who was, I  
25 guess, outside the door?

1 A Yes.

2 Q Okay. Did it ever bother you that a  
3 security guard or security officer was sitting  
4 outside within -- with the ability to see the inside  
5 of the room?

6 A Yes.

7 Q And did you ever raise that issue with  
8 anybody?

9 A No. No, because I understood that, you  
10 know, what may be most comfortable to me in a legal  
11 visit with a client, you know, has to be balanced by  
12 facility security. And it was not uncommon at other  
13 facilities for guards to sit, you know, outside the  
14 door. You know, you always worry about if they could  
15 accidentally overhear something that you're saying or  
16 something like that. But I understood that that was  
17 just -- that was a security measure that needed to  
18 happen.

19 Q Okay. In your mind, is there any  
20 difference between a security guard being able to see  
21 what's going on in your meeting with Mr. Dubose and  
22 that meeting being recorded?

23 A Yes.

24 Q Okay. Explain that for me.

25 A This is, you know, my perception. A

1 meeting being recorded concerns me more because I  
2 worry about the ability to zoom in.

3 Q I'm sorry, you can -- you're worried  
4 about that?

5 A The ability to zoom in --

6 Q Okay.

7 A -- and see written documents. You know,  
8 I was often there for -- you know, with my case  
9 notebook and to talk to him about mitigation things,  
10 but the other people on the team would often go there  
11 with large quantities of discovery documents. You  
12 know, that concerns me. It concerns me -- the  
13 position of that camera is not such that you could  
14 really see our mouths very well, but it concerns me  
15 just in general having a recorded visit that could  
16 then be shown to, you know, someone who could read  
17 lips or something like that to try to figure out  
18 what's going on.

19 The security officer outside the door was  
20 there for security reasons and not to try to figure  
21 out, you know, what we were talking about. And  
22 the -- the concern with recorded visit is that it  
23 could be misutilized and used to that -- to that aim  
24 of trying to figure out what we were talking about.

25 Q Uh-huh.

1                   And do you know whether during any of  
2   your meetings with Mr. Dubose any sort of zoom-in  
3   feature was used so people could see the contents of  
4   documents?

5           A     I -- I don't -- I don't know.

6                   MR. COLE:   Okay.   That's all I have.

7                               EXAMINATION

8   BY MR. COX:

9           Q     I have just a few questions.   My name is  
10   Charlie Cox.   I represent Mr. Nix and Mr. Richey.

11                   Have you met either one of those  
12   gentlemen?

13          A     No, I don't think so.

14          Q     Other than you and other members of the  
15   defense team, do you know if anyone else was able to  
16   have had contact visits with Mr. Dubose between June  
17   and November of 2019?

18          A     No, they weren't.

19          Q     I want to follow up just a few more  
20   questions about the visits in the room and the guard  
21   outside that you were just asked about.

22                   As we looked at the video of you speaking  
23   to Mr. Dubose, you were sitting on either side of a  
24   long table.   And to your right was a wall that had a  
25   lot of windows if not almost all glass, correct?

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 157**

1           A       Yes.

2           Q       Mr. Dubose was in front of you, correct?

3           A       Yes.

4           Q       And then where was the guard situated in  
5 relation to you and Mr. Dubose and the glass windows  
6 on the right?

7           A       So the guard was to my left. Those glass  
8 windows were to my right. What that was, was the  
9 kind of visitation views where you have the phones.  
10 So -- so that's what that was from my -- from my  
11 memory. And so the hallway to come into the room  
12 was -- was on my left. And that's where the officer  
13 sat.

14          Q       And when we looked at the video earlier,  
15 you couldn't see the left side of the room that was  
16 to your left.

17                   Is that -- do you recall that?

18          A       The hallway. It was a hallway.

19          Q       Okay.

20          A       Yeah.

21          Q       And was there a wall between you and the  
22 guard or just a hallway? Give me a little better  
23 description of it.

24          A       Yes. So it was a hallway, a wall and  
25 there was the door.

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 158**

1           Q     Okay.

2           A     So you come into the room with the door.  
3     The door had a lot of glass in it. My memory that  
4     I'm -- my memory is that yes, the hallway had glass  
5     too because I remember being able to walk down the  
6     hallway, and I could see him sitting in the room up  
7     there. So it was pretty visible.

8           Q     So when you are talking into the room  
9     where you would meet with Mr. Dubose, you would walk  
10    down a hallway and you could look to your right  
11    through windows in the wall and see the room that you  
12    would be meeting --

13          A     It was to the --

14          Q     -- with Mr. Dubose, correct?

15          A     To the (inaudible) coming down the  
16    hallway, yes. So --

17          Q     Okay. All right.

18          A     Yeah, come down the hallway. And I'm not  
19    supposed to gesture, but come down the hall -- you're  
20    walking down the hallway, the room would be here.

21          Q     Okay.

22          A     So we would turn in and then turn -- turn  
23    this way. And I would be sitting, facing this  
24    direction. And then those other visitation booths  
25    were to my right.

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 159**

1           Q     Okay. The result was you had glass  
2 windows on either side of where you were meeting with  
3 Mr. Dubose, correct?

4           A     That's my memory, yes.

5           Q     And then the guard would be on the  
6 outside of the room to your left either looking  
7 through a window or a door?

8           A     Yes.

9           Q     The window and the door while you were  
10 meeting?

11          A     Yes.

12          Q     Okay. And about how far away was the  
13 guard when he was outside the other side of the door  
14 while you were meeting with Mr. Dubose?

15          A     You know, it was a narrow hallway. It  
16 was a narrow hallway, so, you know, if -- if the door  
17 is, like, right here, you know, they would be  
18 maybe -- they would be sitting on the other side of  
19 the hallway to allow any traffic to go through, you  
20 know, sitting there in a chair, usually.

21          Q     Okay. And --

22          A     Three feet -- three or four feet, maybe,  
23 if I had to --

24          Q     Okay. You testified earlier about  
25 Mr. Dubose giving you a fabric-type ring that he had

1 created or somebody in the prison had created that he  
2 gave you, correct?

3 A Yes.

4 Q And I think you said that he also gave  
5 you some art; is that correct?

6 A Like, on notebook paper. He would -- he  
7 would mail me -- you know, I would ask him sometimes  
8 to write out certain things for me, you know, tell me  
9 the names of all your cousins, kind of deal and mail  
10 it in, things like that. And he would sometimes  
11 include just on notebook paper, you know, drawings  
12 that he had done.

13 Q And do you still have that art that he  
14 gave you?

15 A I -- I do.

16 Q Okay. That was separate than what may be  
17 or was in his file with the defenders office?

18 A It was in the file with the defenders  
19 office. And after he died this past June, I asked if  
20 I could receive -- if I could -- if I could get the  
21 things that -- like, that -- that he had made for me,  
22 and they said that that was fine.

23 Q Other than that art that he made, was  
24 there anything else that you were able to take out of  
25 what had been in his file at the defenders office



1     **that you now have in your possession?**

2           A     I have -- I have the letters -- the  
3     letters that he sent me. Most of them were, you  
4     know, case -- very case specific. But basically, the  
5     capital defenders office gave me all the letters that  
6     were addressed to me. My understanding is everyone  
7     on the team was allowed to keep -- because he would  
8     write different people on the team different letters,  
9     and we were able to keep the letters that he had  
10    written us and the different things that he had sent  
11    us individually.

12           Q     **Were all of the letters that you kept**  
13    **from him case specific, or were some of the letters**  
14    **personal that do not discuss the case?**

15           A     They all -- they all discussed  
16    mitigation. It was -- it was -- you know, the  
17    letters that he would write to me, it would be me  
18    saying things like, Please write down -- you know,  
19    because memory -- in a meeting at the time, you know,  
20    maybe he couldn't remember certain things, and I'd  
21    say, Okay, please write down, you know, maybe your  
22    earliest memory of your dad, or he had a lot of  
23    issues with his family. So I would ask about  
24    different -- you know, Can you share with me some  
25    memories of your dad's, you know, alcoholism or share

1 me some -- some happy memories with this person or  
2 things like that.

3 So they were -- they were all -- they  
4 were mostly personal stories. There were some  
5 letters in which he would just kind of be talking  
6 about his -- the difficulty of being in a death  
7 penalty case and how depressed he was and things like  
8 that. You know, we kept telling him if you're  
9 writing about your feelings, if you're writing about  
10 the case, if you're writing about anything, write to  
11 us. You know, we're your legal team. You know,  
12 don't -- it's just not safe and smart to, you know,  
13 write that to some- -- you know, someone else.

14 Q Are there other clients that you had that  
15 you also kept their communications after you left the  
16 defenders office?

17 A Yes. I have a couple of letters from  
18 some other clients. I think the letters I've kept  
19 from other clients are things that they sent me once  
20 their case resolved.

21 Q When Mr. Dubose would write letters to  
22 you, what name did he use to refer to you in the  
23 letter?

24 A I remember this very well. He would  
25 always write Lily Engleman, and he would put it in

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 163**

1 quotation marks because I don't think he knew what  
2 quotation marks were for. So he would -- he would  
3 Lily Engleman in quotation marks.

4 Q Like, on the outside of the letter?

5 A Uh-huh.

6 Q And what about at the -- the salutation  
7 part of the letter, or was there a salutation part of  
8 the letter?

9 A I honestly don't remember. Hi, Lily,  
10 maybe something like that.

11 Q What name did you use when you  
12 communicated with Mr. Dubose, use for him?

13 A Ricky. We all called him Ricky. You  
14 know, there are some clients who I called  
15 Mr. So-and-So or Mrs. So-and-So. There are some that  
16 I think it's better to use their first name.

17 MR. COX: Just one moment. I don't  
18 have any other questions. Thank you.

19 MR. GREEN: Is there anyone else in  
20 the room that has questions?

21 MR. COX: That's it for the room.

22 EXAMINATION

23 BY MR. GREEN:

24 Q Okay. I just have a few questions for  
25 you, Ms. Engleman.

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

**Page 164**

1 MR. BEGNAUD: Mr. Green.

2 BY MR. GREEN:

3 Q I represent Ms. Moss.

4 You testified earlier that Ms. Moss was  
5 present on the day you were arrested; is that  
6 correct?

7 A Yes.

8 Q Prior to that, had you had any  
9 interaction or contact with Ms. Moss?

10 A No.

11 Q Did she say anything to you the day she  
12 was -- you were arrested?

13 A I honestly don't remember very well. I  
14 remember talking to Mr. Adkerson a lot. I remember  
15 one of either Ms. Moss or one of the other women  
16 patting me down, and maybe there was -- you know,  
17 there would have been some communication about that.  
18 I remember Mr. Adkerson doing most of the talking. I  
19 was -- I was very stressed, and I honestly don't  
20 remember specifically.

21 Q Okay. Since then, have you had any  
22 contact with Ms. Moss?

23 A No.

24 Q The testimony about the fabric ring that  
25 was given to you, were there any items of jewelry or

1 anything else made for any other members of the legal  
2 team?

3 A I -- I'm honestly not sure. I just -- I  
4 don't remember. I don't remember if he gave them --  
5 if he gave other people things when they visited.

6 Q And you may have already been asked this.  
7 I apologize if you have been.

8 Can you describe the tattoos on his feet,  
9 Mr. Dubose's feet?

10 A No. He had so -- he had so many. He had  
11 so many. You know, I -- I remember ones on his head  
12 a little bit better because those were ones I saw  
13 every time I saw him. I don't specifically remember  
14 what was on his feet.

15 MR. GREEN: That's all I have.

16 Does anybody else on Zoom have any  
17 questions?

18 (Whereupon, a discussion ensued off the  
19 record.)

20 MR. BEGNAUD: And Eric O'Brien, are  
21 you going to be going first?

22 MR. O'BRIEN: Yes.

23 MR. BEGNAUD: Okay. Just identifying  
24 for the Court Reporter.

25 MR. O'BRIEN: Yeah, this is Eric

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

**Page 166**

1 O'Brien. I represent Jonathan Adams.

2 EXAMINATION

3 BY MR. O'BRIEN:

4 Q Ms. Engleman, have you had any  
5 conversations with Jonathan Adams?

6 A No.

7 Q Now, you describe the process around the  
8 indictment as shady.

9 Can you go into a little more specifics  
10 about what you mean by that?

11 A Around the indictment, specifically?

12 Q Yes.

13 A I remember -- I remember being informed  
14 by Don -- this is what Don told me.

15 MR. BEGNAUD: Actually, I think you  
16 probably shouldn't be getting into what you  
17 guys --

18 THE WITNESS: Okay. I won't say that.  
19 Sorry.

20 A It -- it seemed to come out of nowhere.  
21 It was a year after the arrest. That seemed bizarre  
22 to me. And I know that it was COVID time and  
23 everything, but the fact that it took a whole year to  
24 indict me, you know, seemed really unusual. I -- I  
25 knew that there wasn't any evidence. I knew I didn't

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 167**

1 give him anything. I know that -- I knew that there  
2 was no contraband -- contraband found on him. And so  
3 I -- I -- I just had -- I struggled to understand how  
4 it was indicted.

5 BY MR. O'BRIEN:

6 Q Okay. So there wasn't any acts or  
7 statement by anyone with the district attorney's  
8 office that you would describe as shady; is that  
9 correct?

10 A I don't know how to answer that without  
11 talking about conversations I had with Don Samuel.

12 MR. BEGNAUD: If you guys want to take  
13 a break, I can chat with Ms. Engleman about  
14 her legal options, and we can see if we  
15 want to waive that.

16 MR. O'BRIEN: Yeah, that's fine.

17 MR. BEGNAUD: Okay.

18 THE VIDEOGRAPHER: The time is  
19 2:01 p.m. We're now off the record.

20 (Whereupon, the video camera was  
21 turned off.)

22 (Whereupon, a brief recess was taken.)

23 (Whereupon, the video camera was  
24 turned on.)

25 THE VIDEOGRAPHER: The time is

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

**Page 168**

1 2:05 p.m. We're back on the record.

2 MR. BEGNAUD: And my client and I  
3 spoke. And as we discussed off the record,  
4 just now my client is going to limit --  
5 this will be a limited waiver of  
6 attorney/client privilege where my client  
7 will answer the question that you were  
8 asking.

9 BY MR. O'BRIEN:

10 Q Let me (inaudible) this first.

11 In terms of the district attorney's  
12 office, did you only deal with Don Samuel?

13 A I'm sorry, you were breaking up a little  
14 bit.

15 Can you say that again?

16 Q Was Don Samuel the only individual that  
17 you dealt with at the district attorney's office?

18 A Don Samuel was my attorney.

19 You mean Jonathan Adams?

20 Q No, I'm sorry. There's another Samuels  
21 in the district attorney's office, so I got  
22 (inaudible).

23 A Okay.

24 Q Sorry about that.

25 Okay. What conversations did you have



1 with Don Samuel that -- that you relate back to the  
2 district attorney's office as being inappropriate or  
3 shady?

4 A So Don -- Don Samuel, my attorney, Don  
5 Samuel, called me in November of 2021 to tell me that  
6 I had been indicted about three weeks prior. He said  
7 he was very surprised by this himself because he had  
8 conversations with Jonathan Adams in which he had  
9 asked Jonathan Adams, If you think that you want to  
10 move forward with an indictment, will you let me know  
11 on the front end?

12 And Jonathan Adams had told him, Yes, I  
13 will.

14 And so then when I was indicted and then  
15 we weren't notified for three weeks later, Don was --  
16 Don was very surprised and confused by that. So he  
17 -- he relayed that to me during that phone  
18 conversation.

19 Q Okay. Was -- did Jonathan Adams ever  
20 give an explanation for the lack of notification?

21 A I don't know. If so, that was not  
22 communicated to me.

23 Q Okay. So that was the only statement  
24 that -- that seemed inappropriate or not by procedure  
25 from the district attorney's office?

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 170**

1 MR. BEGNAUD: You mean with regard to  
2 this -- the indicting, specifically?

3 MR. O'BRIEN: Yes.

4 A Yes.

5 BY MR. O'BRIEN:

6 Q Okay. Were there any other comments from  
7 the district attorney's office outside of the  
8 indictment that you seemed -- that were shady in your  
9 terms?

10 A So there was -- there was an assistant DA  
11 at the Butts County office who was primarily  
12 responsible for prosecuting my case under direction  
13 of Jonathan Adams. I don't remember that  
14 individual's name right now, unfortunately. But I  
15 remember once I was indicted and then we finally  
16 obtained discovery was, you know, a year -- over a  
17 year after my arrest before we got any -- any  
18 discovery before we saw this video ourselves.

19 And Don set up an appointment with  
20 Jonathan Adams to talk about the fact that there's  
21 nothing on the video. And he -- he told me that he  
22 went down there to Butts County to meet with Jonathan  
23 Adams, and when Jonathan Adams realized he wanted to  
24 talk to him about the fact the video doesn't show  
25 anything and he was trying to talk to him about

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 171**

1 dropping the charges, Jonathan Adams got kind of  
2 upset and, like, walked out of the room and was --  
3 said something to the effect of, you know, This is --  
4 this is a waste of my time. I don't want to -- I  
5 don't want to meet with you anymore. And so from  
6 then on, my understanding is Don dealt with and met  
7 with the ADA whose name I don't remember.

8 But Don kind of communicated all of that  
9 to me in the -- the sense -- he just seemed very  
10 confused by it all. He said that he's never really  
11 had a district attorney react in that way. Jonathan  
12 Adams was amenable to setting up the meeting, was  
13 there for the meeting. And then when he found out  
14 what Don wanted to talk about, he just, you know,  
15 shut the meeting down and left.

16 **Q And that's when he was frustrated, was**  
17 **just based on the -- just the outset of the**  
18 **conversation trying to get the charges dismissed?**

19 A I'm so sorry. Could you say that again?

20 **Q So that was just at the outset of the**  
21 **meeting? It was just about the topic of trying to**  
22 **get the charges dismissed?**

23 A Yes. He wanted Jonathan Adams to sit  
24 down and watch this video with him and go through it  
25 frame by frame talking about it. And he refused.

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 172**

1           Q     Okay. And this is after the indictment?

2           A     Yes. I want to say that this was like  
3     February or March of 2021.

4           Q     Okay. And just in terms of the  
5     indictment and the timing of it and the length of  
6     time that it took, you were still aware that your  
7     charges were going to be presented to the grand jury,  
8     you just weren't aware of the timing; is that  
9     correct?

10          A     That's -- that's correct. I mean, I  
11     assumed after I was arrested in November 6, 2019, I  
12     assumed that the case would be presented to the grand  
13     jury, you know, that next -- what is it called? --  
14     the next jury seating. And it wasn't. I -- we never  
15     really got an explanation as to why it wasn't.

16                 And, you know, when it then wasn't for  
17     months and months and months, I thought, Well,  
18     surely, they realize that there's nothing here in  
19     this case, and they're just, I don't know, eventually  
20     going to drop it. I don't know why they're not doing  
21     that yet. So it -- by the time it was actually  
22     indicted, it was a shock to me that it was actually  
23     indicted.

24          Q     Okay. And you -- you found out  
25     three weeks later, so you weren't at the grand jury

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 173**

1     **presentment. That's correct?**

2             A     Correct.

3             **Q     Okay.**

4                     MR. O'BRIEN: Okay. I don't have any  
5     other questions.

6                             EXAMINATION

7     BY MR. BINGHAM:

8             **Q     Ms. Engleman, my name is Derrick Bingham.**  
9     **I represent testimony Tomeika Jordan, and I just have**  
10    **a -- just very briefly -- just very brief follow-up**  
11    **for you.**

12                     Do you know who Tomeika Jordan is?

13             A     Yes.

14             **Q     And who do you understand Tomeika Jordan**  
15    **is?**

16             A     I understand that she's an agent with  
17    OPS, I believe, or she's --

18             **Q     (Inaudible).**

19             A     I'm sorry, go ahead.

20             **Q     No, I interrupted you. I apologize. Go**  
21    **ahead.**

22             A     I know that she did a lot of -- of kind  
23    of gathering records together. I know that we --  
24    "we," meaning the Dubose team, she -- she would -- I  
25    know that she got initial discovery together in

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 174**

1 the -- the murders of the correctional officers. I  
2 know that she had a hand in getting all of that  
3 together. I know that she dealt with a lot of, like,  
4 records stuff there.

5 Q Okay. And that was -- was that before  
6 you were arrested that she was involved in getting  
7 the records together in the discovery --

8 A Yes.

9 Q -- and in that area?

10 A Yes.

11 Q After you were arrested, did you -- well,  
12 first of all, have you ever spoken to her directly?

13 A No.

14 Q Was she present the day you were  
15 arrested?

16 A I don't think so.

17 Q Do you have any personal knowledge of any  
18 involvement or what involvement, if any, she may have  
19 had in the decision to seek a warrant for your  
20 arrest?

21 A I think she saw the video and listened  
22 (inaudible) about the video, but I'm not 100 percent  
23 sure.

24 Q Okay. And what -- what do you base that  
25 belief on?

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 175**

1           A       I know that several people at SMU were  
2   seeing the video, were shown the video, and I know  
3   that there were discussions about arresting me and  
4   such. And I have a memory that she was maybe part of  
5   that, but I'm -- I'm not 100 percent sure.

6           Q       And this memory that you have, would this  
7   be based on documents you reviewed, or is that -- is  
8   it based on documents you reviewed?

9           A       Yes.

10          Q       Not based on anything you know personally  
11   from your own personal knowledge, correct?

12          A       That's -- that's correct. I'm basing  
13   this on -- I know in the discovery documents for my  
14   case that I received with all the case reports and  
15   everything that Nathan Adkerson wrote, there's --  
16   there's just different names mentioned as to who --  
17   I've seen different things. I'm honestly -- I  
18   honestly just don't remember all the different names.

19          Q       The -- with regard to the media -- I know  
20   you've answered this question about other defendants.  
21   I just want to just be clear.

22                    You have no reason to believe that  
23   Ms. Jordan had any role in contacting the media about  
24   your arrest; is that correct?

25          A       I have no idea who contacted the media.

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 176**

1           Q     And as far as the recording of your  
2 meetings with Mr. Dubose, you don't have any reason  
3 to believe that Ms. Jordan personally had any role in  
4 recording those and recording these meetings or the  
5 decision to have a camera in that room or anything  
6 related to those recordings, do you?

7           A     I -- I just don't know.

8                     MR. BINGHAM: That's all the questions  
9 I have. Thank you.

10                                     EXAMINATION

11 BY MR. BALLINGER:

12           Q     Good afternoon, Ms. Engleman. My name is  
13 Eric Ballinger. You commented on my picture earlier.

14           A     I do like your bow tie.

15           Q     You're too kind. It's an old picture  
16 and --

17           A     I didn't know that you could hear me at  
18 the time. I didn't know that you could hear me at  
19 the time. I think -- I thought I was on -- it was on  
20 mute.

21           Q     Okay. I represent Jose Morales.  
22 Do you know who he is?

23           A     Yes.

24           Q     And who is he?

25           A     He's the warden. I assume he still is.



**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 177**

1 At the time, he was the warden at special management  
2 unit.

3 Q Okay. And did you have any interaction  
4 with Mr. Morales?

5 A Yes. I interacted with him a few times.

6 Q Okay. What were those interactions?

7 A The majority of them -- like I said, when  
8 I would come to visit Ricky, I would have to wait in  
9 that lobby area for a while. And there would be, you  
10 know, employees walking back and forth at different  
11 times. Mr. Morales would often walk by. You know,  
12 he knew who I was. You know, I was a member of  
13 Ricky's defense team. He would stop. He would say  
14 hi. Sometimes he would say things like -- you know,  
15 asked me how long I had been waiting and kind of  
16 indicate that he would tell officers to hurry up and  
17 get Ricky.

18 I remember more prolonged conversation  
19 with him one time. I was there visiting Ricky with  
20 another member of the Dubose team. It was the two of  
21 us together, and we were waiting in the lobby area.  
22 And Warden Morales came up and started talking to us.  
23 And he was just -- from what I remember, this was,  
24 you know, maybe four years ago at this point, he was  
25 just kind of talking about, like, ins and outs of

1 managing a correctional facility and, you know,  
2 difficult inmates and just kind of telling, you know,  
3 stories about what it's like to -- to run a  
4 correctional facility.

5 You know, that was the most prolonged  
6 interaction that I had with him. We chatted with him  
7 for maybe 15 minutes, I think.

8 Q Did you have any negative interactions  
9 with Mr. Morales?

10 A No.

11 Q Any unpleasant interactions with  
12 Mr. Morales?

13 A No.

14 Q Okay. Now, you have been -- in your  
15 earlier testimony, you've been visiting inmates at  
16 various correctional and institutions throughout your  
17 entire career; is that correct?

18 A Yes.

19 Q And this was your first case where you  
20 had -- were visiting inmates at the MTU?

21 A SMU, special management unit, yes.

22 Q SMU, sorry.

23 And how many -- how many inmates did you  
24 have at the -- how many inmates did you have total on  
25 your caseload at the time you started working on the

1     **Dubose case?**

2           A     At the time I started working on the  
3     Dubose case was right when I first was hired. And I  
4     was put on three cases initially immediately. If I  
5     remember correctly, I'm actually worried that I'm  
6     forgetting someone. And I remember I received  
7     another case -- no, I was put on -- yeah, I was put  
8     on three, I think. I received another case maybe  
9     six months in, and I received another case maybe  
10    six months after that.

11          Q     **And all of these were capital cases?**

12          A     Yes. Every case that that office handles  
13    is a capital case.

14          Q     **And how many people total were on the**  
15    **Dubose team?**

16          A     So the team grew as time went on. There  
17    were two main attorneys. I know as they were gearing  
18    up to trial, they -- they added two more. But for  
19    the -- yeah, they added -- they added two more. I  
20    would say three, four, five, six, like seven-ish.  
21    And again, it -- you know, it grew a little bit.  
22    When we had team meetings, there were usually about  
23    seven people there.

24          Q     **And do you remember the names of the**  
25    **people who were on the team?**

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 180**

1 A Sure. Yeah.

2 Q Who are they?

3 A Amber Pittman was the lead attorney. She  
4 was the first chair attorney at the Macon office.  
5 Ms. Anna Szatkowski was the second chair attorney.  
6 Jerry Ward, who was the director of the capital --  
7 the capital defenders office, was also on the team.  
8 He kind of did more consulting-type stuff, though he  
9 participated heavily in the trial. He wasn't quite  
10 as involved in, like, the day to day, so to speak.

11 I was the mitigation specialist. Ani  
12 Szatkowski, who I mentioned earlier, she also was  
13 part of the team officially, but she didn't have as  
14 much to do with the day to day.

15 Deriana Doss was another mitigation  
16 specialist. She was the person who went on maternity  
17 leave, who I -- who I kind of replaced when she was  
18 on maternity leave. When she came back from  
19 maternity leave, she was still a member of the team.  
20 She -- she handled certain aspects of the case but  
21 wasn't quite as involved in certain other aspects.

22 Vivia Harris was the fact investigator.  
23 And then there was another attorney named Shayla  
24 Galloway who got pulled into the team maybe the last  
25 year and a half leading up to trial.

1           Q     And how many times did you -- I'm sure  
2     you don't know exactly -- the number exactly, but how  
3     many times did you visit Mr. Dubose?

4           A     I would say between 20 and 25 times,  
5     maybe, because I know I started seeing him August or  
6     September of 2017. I know I was arrested, you know,  
7     November of 2019, so it's about a little more than  
8     two years. And I saw him -- I would visit him about  
9     every three to four weeks. You know, there may be a  
10    month where it's a little bit different because I  
11    would see him in court or things like that. But on  
12    average, it was about -- I would visit him about  
13    every three to four weeks.

14          Q     So what came to work for the capital  
15    defenders office? Was there any training on what you  
16    were or were not allowed to bring to -- to visit  
17    inmates with at correctional facilities?

18          A     Well, every -- every facility is a little  
19    bit -- is a little bit different. You know, if they  
20    got -- they all have the signs posted outside, you  
21    can't bring in cell phones, you know, you can't bring  
22    in weapons, of course, no metal, you know. But some  
23    facilities were very strict about things like staples  
24    in your documents. Other small town county jails,  
25    you know, weren't as -- didn't seem to care about

1 stuff like that as much.

2 You know, my memory is that SMU was  
3 obviously much more strict. You know, I -- you know,  
4 I remember not being able to bring in, like -- now  
5 that I say that, I'm actually not sure about, like,  
6 paperclips. I don't know if I was -- you know, if I  
7 would paperclip documents or not. I don't remember.

8 But, you know, there was always a lot of  
9 discussion as to I have a client in this facility,  
10 has anyone been to this facility before, what are  
11 they like. You know, do they -- can I staple my  
12 papers, or should I not staple my papers and things  
13 like that.

14 Q And were all of your contact visits with  
15 all of your clients, were they all -- were all your  
16 visits with clients all contact visits?

17 A Yes.

18 Q At all of the institutions?

19 A Yes.

20 Q And were they ever restricted to just  
21 through the glass telephone visits?

22 A No. Ricky is -- Ricky asked me -- was  
23 the only one that was ever restricted.

24 Q And so did you often -- did you ever have  
25 to meet him through the -- through the -- with the

1     **telephone and glass?**

2           A     I did. SMU initially had a policy -- I  
3     don't know if it's still in place -- that attorneys  
4     can have contact visits with clients, but other  
5     members of the legal team can't. They have to have  
6     visits through the glass. So the first few times I  
7     went to see him, I mean, I was, you know, in  
8     training, still kind of learning stuff. I always  
9     went with an attorney. And then once I started  
10    visiting him one-on-one, it was the contact visits  
11    through the glass. This is very difficult. The  
12    phones were, like, incredibly staticky. It was very  
13    hard to hear each other. And it's not conducive to  
14    building the kind of rapport and relationship  
15    building that a mitigation specialist is supposed to  
16    build with their client.

17               And we got a court order authorizing, you  
18    know, confidential contact visits for me and for  
19    every member of the defense team. And that was  
20    standard protocol for my office. My office had --  
21    has had other clients in other cases housed at SMU,  
22    and the standard protocol was to get a court order  
23    allowing confidential contact visits for every member  
24    of the team.

25           Q     And the -- when did you first notice that

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 184**

1       there was a camera in the -- were you -- strike that.

2       Let me go back and ask you.

3                       Were all of your visits -- contact visits  
4       in the same conference room?

5               A       Yes.

6               Q       Okay. And when did you first notice the  
7       camera in the conference room?

8               A       I -- I will -- I will maybe amend my last  
9       answer because the first several times I visited him  
10      one-on-one, it was in a different booth with the  
11      glass and the phone. Once we moved to the contact  
12      visit, yes, they were all in that room. I don't  
13      remember exactly when I first noticed the camera.  
14      Probably that first visit.

15              Q       Did you ask anybody at the SMU if that  
16      camera was recorded?

17              A       No.

18              Q       Did you bring it to the attention of  
19      anybody at the SMU?

20              A       No.

21              Q       Did you bring it to the attention of  
22      anybody on your team?

23              A       That's a good question. I don't remember  
24      if we would -- if it was mentioned amongst us. I  
25      honestly don't remember. I honestly don't remember.



**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 185**

1 A lot of correctional facilities I went into and  
2 others went into didn't have cameras in the  
3 visitation room. And so I don't remember if that was  
4 something we all commented on like, Oh, that's kind  
5 of weird. I don't remember.

6 Q Now, how was this camera set up in the --  
7 in the visitation room?

8 A To -- to my memory, it was -- it would  
9 have been behind where Ricky was sitting, like in the  
10 left corner. You know, it was one of those, like,  
11 round -- you know, like, round things, from what I  
12 remember.

13 Q Was it mounted to the wall? Was it  
14 mounted to the wall?

15 A It was -- I think it was in the -- just  
16 like in the corner, like where the wall and ceiling  
17 meet, I think -- I think. I -- you know, it's not  
18 like I was staring at it. I -- it was just kind of  
19 out of my peripheral, you know, a lot of the times.

20 Q But the camera faced Mr. Dubose's back?

21 A Yes. Yes.

22 Q So it wouldn't have been able to see his  
23 face, correct?

24 A That's correct.

25 Q Unless he turned towards it?

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

**Page 186**

1           A       That's correct.

2           **Q       Okay. So --**

3                   THE WITNESS: Oh, I can't hear you.

4                   MR. BEGNAUD: We can't hear you.

5                   THE WITNESS: We're all frozen.

6                   THE VIDEOGRAPHER: The time is

7           2:30 p.m. We're now off the record.

8                   (Whereupon, the video camera was  
9           turned off.)

10                   (Whereupon, a brief recess was taken.)

11                   (Whereupon, the video camera was  
12           turned on.)

13                   THE VIDEOGRAPHER: The time is

14           2:32 p.m. We're back on the record.

15   BY MR. BALLINGER:

16           **Q       So anyone else comment about the video**  
17   **camera?**

18           A       I'm sorry, say that one more time.

19           **Q       Did anybody else on the Dubose team**  
20   **comments about the video camera?**

21           A       I don't remember. I really don't  
22   remember if we did or not.

23           **Q       And do you know if any other teams have**  
24   **encountered the same camera in the visitation room at**  
25   **the SMU?**

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 187**

1           A       Yes. I mean, at -- at the time, there  
2       was another capital client my office was representing  
3       that was at SMU. And, you know, their team also had  
4       no idea that they were being recorded until this  
5       happened with me. So I know that that was something  
6       that they were, of course, very concerned about  
7       themselves and, you know, worked with their judge and  
8       SMU to make sure that that didn't happen.

9           Q       And this other inmate at SMU, was that  
10      Mr. Dubose's codefendant?

11          A       Actually, I'm glad you mentioned that. I  
12      was thinking of someone totally different. Yes,  
13      there was Mr. Dubose's codefendant. Of course,  
14      because that was a codefendant case, this is why I  
15      don't really think about him because I just didn't  
16      have hardly any -- I didn't have any interaction with  
17      that team about him because it was a codefendant  
18      case, it was a conflict case.

19                 There was a -- there was a third inmate  
20      at SMU at the time. His first name was Cesar. His  
21      last name escapes me right now, but he -- he was  
22      there, and I know that his team was very -- very  
23      concerned about the -- the recording situation. I  
24      assumed that Donnie Rowe, the -- Ricky's codefendant,  
25      I assume that his team was also very concerned. I

1 just -- you know, it was a complicate- -- we didn't  
2 talk about that.

3 Q The -- when you first started going to  
4 meet with clients at the -- at the SMU, did anybody  
5 from the Department of Corrections give you a  
6 briefing or discuss with you what -- what types of  
7 things are allowed and not allowed in for the contact  
8 visits?

9 A I don't remember that, no.

10 Q Was there -- were there signs there  
11 indicating what was allowed to -- or to be brought in  
12 for contact visits?

13 A You know, just the big sign out front  
14 like you see at every facility that says, you know,  
15 no cell phones, no wepers -- weapons, no lighters, no  
16 lighter fluid. I don't remember receiving -- I  
17 certainly never received any kind of paper  
18 documentation or anything like that from the facility  
19 regarding, you know, what we could give our clients  
20 during contact visits or bring in or anything like  
21 that.

22 Q Whenever you would check in, would  
23 anybody ask you about if you had any contraband  
24 items?

25 A I honestly don't -- I don't remember. I

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 189**

1 don't remember if there was, like, a verbal, you  
2 know, do you have any weapons on you? I don't --  
3 frank- -- I honestly don't remember.

4 **Q I want to go back to something earlier in**  
5 **your testimony.**

6 **You said -- mentioned somebody that --**  
7 **somebody from Mr. Dubose's family said that you were**  
8 **in love with him.**

9 **Who was that?**

10 **A That was a cousin. I have a memory that**  
11 **her name was Nicki or Niquita. I don't remember her**  
12 **last name. She was in Texas. I don't remember**  
13 **exactly if -- I don't remember if she was, like, a**  
14 **maternal or a paternal cousin.**

15 **Q And was that communication documented in**  
16 **the capital defenders file?**

17 **A My interview with her?**

18 **Q Yes.**

19 **A Yes. I wrote memos --**

20 **Q Where she made that comment?**

21 **A She made that -- she made that comment --**

22 **Q (Inaudible).**

23 **A She made that comment on a Facebook post**  
24 **after I was arrested. There were the -- the articles**  
25 **regarding my arrest were -- you know, there are**

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Page 190**

1 articles regarding my arrest out in the media. And  
2 it seems she or someone else in the Dubose family  
3 shared an article on Facebook. And she made a  
4 comment about -- to that effect on Facebook that  
5 Nathan Adkerson later found and -- yeah. That was  
6 not a comment that she made to me.

7 **Q Do you have a copy? Okay. Do you have a**  
8 **copy of that Facebook post?**

9 MR. BEGNAUD: It's -- if I can help,  
10 it's in the case file. It's -- it's in --  
11 Mr. Adkerson's case file is in the record  
12 in this lawsuit.

13 BY MR. BALLINGER:

14 **Q All right. Let me ask you this: Were**  
15 **you in love with him?**

16 A No.

17 THE COURT REPORTER: I'm sorry, what?

18 BY MR. BALLINGER:

19 **Q Did you have feelings for him?**

20 A No.

21 MR. BEGNAUD: Just a second, the Court  
22 Reporter is asking -- the question was:  
23 Are you in love with him?

24 THE COURT REPORTER: Thank you.

25 BY MR. BALLINGER:

1           Q     It was, were you in love with him, but --  
2     and the answer to that was no?

3           A     No.

4           Q     Did you have an emotional connection to  
5     him?

6           A     You know, as much as I have an emotional  
7     connection with all of my clients. Even -- even now,  
8     doing noncapital work, I have a caseload of roughly  
9     about 12 clients, and, you know, I have an emotional  
10    attachment with all of them.

11          Q     Anything different -- anything different  
12    or different from the emotional connection between  
13    Ricky Dubose and any of your other clients?

14          A     No.

15          Q     Did he -- did Mr. Dubose ever give you  
16    any indications -- without going into any  
17    confidential communications -- that he had an  
18    emotional connection with you?

19          A     You know, he had an emotional connection  
20    with everyone on his team. And he was thankful. He  
21    expressed his appreciation to all of us. You know, I  
22    don't -- I never got any impression that he had some  
23    kind of attachment to me more so than he did anyone  
24    else on the team.

25          Q     Did he give anybody else on the team a

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

**Page 192**

1     **ring?**

2             A     I don't -- I don't know what all he gave  
3     other people.

4             MR. BALLINGER:   That's all the  
5     questions I have.

6             MR. BEGNAUD:   And I don't have any  
7     questions.

8             THE VIDEOGRAPHER:   This concludes the  
9     deposition.   The time is 2:40 p.m.   We're  
10    now off the record.

11            (Whereupon, the video camera was  
12    turned off.)

13                                 - - -

14            (Deposition concluded at 2:40 p.m.)

15

16

17

18

19

20

21

22

23

24

25



**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Page 193**

## 1 E R R A T A S H E E T

2

3 Pursuant to Rule 30(7)(e) of the Federal  
 4 Rules of Civil Procedure and/or Georgia Code  
 5 Annotated 81A-130(B)(6)(e), any changes in form  
 6 or substance which you desire to make to your  
 7 deposition testimony shall be entered upon the  
 8 deposition with a statement of the reasons given  
 9 for making them.

6

7 To assist you in making any such corrections,  
 8 please use the form below. If supplemental or  
 9 additional pages are necessary, please furnish  
 10 same and attach them to this errata sheet.

9

- - -

10 I, the undersigned, LILY ENGLEMAN, do hereby  
 11 certify that I have read the foregoing deposition  
 12 and that to the best of my knowledge said  
 13 deposition is true and accurate (with the  
 14 exception of the following corrections listed  
 15 below).

13

14

15 Page\_\_\_\_\_ Line\_\_\_\_\_should read:\_\_\_\_\_

16 Reason for change:\_\_\_\_\_

17

18 Page\_\_\_\_\_ Line\_\_\_\_\_should

19 read:\_\_\_\_\_

20 Reason for change:\_\_\_\_\_

21

22 Page\_\_\_\_\_ Line\_\_\_\_\_should

23 read:\_\_\_\_\_

24 Reason for change:\_\_\_\_\_

25

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

**Page 194**

1 Page\_\_\_\_\_ Line\_\_\_\_\_should  
2 read:\_\_\_\_\_  
3 Reason for  
4 change:\_\_\_\_\_  
5  
6 Page\_\_\_\_\_ Line\_\_\_\_\_should  
7 read:\_\_\_\_\_  
8 Reason for  
9 change:\_\_\_\_\_  
10  
11 Page\_\_\_\_\_ Line\_\_\_\_\_should  
12 read:\_\_\_\_\_  
13 Reason for  
14 change:\_\_\_\_\_  
15  
16 Page\_\_\_\_\_ Line\_\_\_\_\_should  
17 read:\_\_\_\_\_  
18 Reason for  
19 change:\_\_\_\_\_  
20  
21 Page\_\_\_\_\_ Line\_\_\_\_\_should  
22 read:\_\_\_\_\_  
23 Reason for  
24 change:\_\_\_\_\_  
25

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

**Page 195**

1 Page\_\_\_\_\_ Line\_\_\_\_\_should  
2 read:\_\_\_\_\_ Reason for  
3 change:\_\_\_\_\_  
4  
5 Page\_\_\_\_\_ Line\_\_\_\_\_should  
6 read:\_\_\_\_\_ Reason for  
7 change:\_\_\_\_\_  
8  
9 \_\_\_\_\_  
10 Signature  
11 Sworn to and Subscribed before me  
12 \_\_\_\_\_, Notary Public.  
13 This\_\_\_\_\_day of \_\_\_\_\_, 2023.  
14 My Commission Expires:  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**  
**Lily Engleman on 02/14/2023**

**Page 196**

1 C E R T I F I C A T E

2 STATE OF GEORGIA:

3 COUNTY OF COBB:

4

5 I hereby certify that the foregoing  
6 transcript was taken down as stated in the  
7 caption and the questions and answers thereto  
8 were reduced to typewriting under my direction,  
9 that the foregoing pages 1 through 195 represent  
10 a true, complete and correct transcript of the  
11 evidence given upon said hearing, and I further  
12 certify that I'm not of kin or counsel to the  
13 parties in the case; am not in the regular employ  
14 of counsel of any of said parties; nor am I in  
15 anywise interested in the result of said case.

16 This 28th day of Febuary 2023.

17

18



19

20

LYNNE C. FULWOOD,  
Certified Court Reporter  
State of Georgia  
License No. B-1075

21

22

23

24

25

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Index: \$5,000..3:47:58**

	<b>12:02</b>	86:11	<b>2009</b>	86:22	<b>25</b>	181:4
<b>Exhibits</b>	<b>12:04</b>	86:18	<b>2010</b>	13:24	<b>27th</b>	118:17
<b>EnglemanL - 2</b>	<b>12:46</b>	122:2	<b>2015</b>	11:1	<b>2985</b>	10:3
6:3	<b>12:53</b>	122:11	14:1		<b>2:00</b>	140:11
122:19,24	<b>13th</b>	83:21	<b>2017</b>	14:2	<b>2:01</b>	167:19
			45:12,16			
<b>\$</b>	<b>1445</b>	9:23	71:13		<b>2:05</b>	168:1
	<b>14th</b>	7:9	181:6		<b>2:30</b>	186:7
<b>\$5,000</b>	<b>15</b>	17:24	<b>2019</b>	20:12	<b>2:32</b>	186:14
140:25		30:17,18	83:21		<b>2:40</b>	192:9,
		58:13	84:25	85:5	14	
<b>1</b>		129:5	126:15			
		178:7	152:11		<b>2nd</b>	45:13
<b>1</b>	<b>7:6</b>		153:1,16			
122:2,12,			156:17		<b>3</b>	
18	<b>18th</b>	24:16	172:11			
<b>100</b>	<b>1988</b>	9:21	181:7		<b>30084</b>	9:23
174:22	<b>1:00</b>	121:23			<b>30315</b>	10:4
175:5	<b>1:07</b>	134:3	<b>2020</b>	10:19,	<b>30319</b>	10:23
<b>1099</b>	<b>1:10</b>	134:10	21	21:15	<b>35</b>	30:6
<b>1099s</b>	<b>1:33</b>	151:16	33:1		<b>37,000</b>	29:23
28:5,	<b>1:40</b>	151:23	35:18,19		30:16	
18 29:1			36:9 40:19		<b>3:45</b>	92:1
<b>10:21</b>			142:23		<b>3:45:35</b>	92:1
<b>10:51</b>			149:7		<b>3:47</b>	92:21
<b>10:52</b>	<b>2</b>				<b>3:47:11</b>	92:24
<b>11</b>	<b>2</b>	122:10,	<b>2021</b>	16:21	<b>3:47:30</b>	86:23
48:1		19,24	22:6,19		<b>3:47:51</b>	87:6
<b>11:28</b>		140:5	27:11,19		<b>3:47:58</b>	87:19
<b>11:43</b>	<b>2.13</b>	32:1,5	29:23		93:17	
<b>11th</b>	<b>20</b>	20:12	30:9,10			
35:18		128:12	37:1 169:5			
37:1		129:18,20	172:3			
<b>12</b>		181:4	<b>2022</b>	24:16		
47:24			27:23			
48:1 191:9	<b>2006</b>	13:14	<b>2023</b>	7:9		
<b>120</b>			<b>23</b>	18:22		
15:24						
18:9						

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Index: 3:48..adaptive**

<b>3:48</b> 93:19		54:18	36:16
	<hr/> 5 <hr/>		
<b>3:48:05</b> 88:1		<b>ability</b>	<b>acquittals</b>
93:25	<b>52</b> 18:13	13:1,6	36:15
102:23	<b>54</b> 18:13	154:4	<b>acting</b> 26:7
<b>3:48:19</b>	<b>5th</b> 9:21	155:2,5	<b>action</b>
103:1		<b>absolute</b>	39:21,22
<b>3:48:21</b>	<hr/> 6 <hr/>	149:18	91:22
103:2		<b>absolutely</b>	93:9,22
<b>3:48:30</b>	<b>6</b> 126:15	61:5 80:7	<b>actions</b> 12:3
103:3	172:11	<b>abuse</b> 26:3	<b>active</b> 22:6
<b>3:48:36</b>	<b>6th</b> 84:1,25	112:16	23:4
104:12	85:5 86:22	<b>accepted</b>	27:13,15
<b>3:48:45</b>	152:11	22:5	<b>actively</b>
104:14	153:1,16	<b>accepting</b>	140:8
<b>3:48:50</b>	<hr/> 7 <hr/>	125:11	<b>acts</b> 167:6
104:15		<b>access</b> 59:20	<b>actual</b> 41:23
<b>3:49:02</b>	<b>706</b> 200-2062	117:18,25	73:22
105:20	12:21	<b>accessories</b>	74:17
<b>3:49:04</b>	<b>75</b> 30:4	123:18	77:21
104:21	<hr/> 9 <hr/>	<b>accidentally</b>	79:10
<b>3:49:23</b>		154:15	124:11
106:1	<b>924</b> 10:23	<b>accommodate</b>	<b>acute</b> 145:16
<b>3:49:30</b>	<b>9:00</b> 126:21	53:13	<b>ADA</b> 171:7
106:5	<b>9:30</b> 126:24	<b>account</b>	<b>Adams</b> 8:5
<b>3:49:46</b>		118:5,23	142:3
107:5	<hr/> A <hr/>	119:8	166:1,5
<b>3:50</b> 108:9,	<b>A-N-U-P-A-M-A</b>	120:10	168:19
16	48:25	<b>accurate</b>	169:8,9,
<hr/> 4 <hr/>	<b>a.m.</b> 7:10	73:13	12,19
	37:25 38:7	87:23	170:13,20,
<b>40</b> 30:6	66:20 67:2	<b>accused</b>	23 171:1,
<b>4th</b> 18:20	<b>abilities</b>	51:22	12,23
		<b>acquitees</b>	<b>adaptive</b>
			51:12

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Index: added..amount**

<b>added</b>	33:3 35:8,	50:16	<b>alcoholism</b>
179:18,19	12,23	51:16	161:25
<b>additional</b>	36:2,3	128:25	<b>Alexander</b>
16:4 28:15	145:22	136:15	142:22
	146:8	137:10	144:5
<b>address</b>		141:12,17	148:22
9:22,25	<b>admittedly</b>	147:12	
10:1,11,18	59:2	150:4,11,	<b>all-day</b>
		12	51:25
<b>addressed</b>	<b>advance</b>		
161:6	72:13		<b>allegations</b>
<b>Adidas</b>	<b>adverse</b> 80:4	<b>agency's</b>	116:9
95:12,14,		41:10	
19	<b>advised</b>	<b>agenda</b> 89:6	<b>alleged</b>
	56:24	<b>agent</b> 173:16	75:6,9,12,
<b>adjacent</b>	<b>advocacy</b>		15
88:12	27:12,25	<b>agents</b>	<b>Alli</b> 37:6
93:25		135:23	39:7,8
104:13	<b>advocate</b>	<b>agree</b> 75:13	40:4 43:2
	36:14	76:11,15	150:2
<b>Adkerson</b>	40:25	99:17	
7:8,18	150:5	104:11	<b>allowed</b>
81:16			94:21
82:24	<b>aftermath</b>	<b>agreed</b> 99:25	117:10
110:7	146:7	115:3	161:7
120:25	<b>afternoon</b>	<b>ahead</b> 66:15	181:16
127:24	176:12	81:3	188:7,11
128:4	<b>agencies</b>	122:17	<b>allowing</b>
129:8	43:5 44:6	126:14	183:23
135:13	50:23	173:19,21	
137:4,19	<b>agency</b> 26:23	<b>aim</b> 155:23	<b>Amber</b> 113:2
138:17,20,	36:12,14,	<b>air</b> 41:15	118:23
25 164:14,	20 37:9		141:5,13
18 175:15	40:22	<b>Alaska</b>	180:3
190:5	42:22,24	111:18,20,	<b>amenable</b>
<b>Adkerson's</b>	43:11,15	21	171:12
138:7	44:15,17,	<b>alcohol</b>	<b>amend</b> 184:8
190:11	20 47:22,	50:19	<b>amount</b> 29:14
<b>administrative</b>	25 48:5,11		110:6

## LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Index: angle..assume

<b>angle</b> 99:3	<b>appeal</b> 47:17	<b>arm</b> 103:16	175:3
<b>Ani</b> 180:11	<b>appearing</b>	106:9,13,	<b>arrived</b>
<b>ankle</b> 74:24	25:7	16 107:24	139:6
108:1	<b>appears</b>	108:15	<b>art</b> 125:8,
<b>Anna</b> 180:5	106:1	<b>arms</b> 90:23	25 126:7
<b>Annarita</b>	125:7	91:8	160:5,13,
7:17 8:13	<b>application</b>	93:14,22	23
<b>answering</b>	39:14	108:17	<b>article</b>
140:8	<b>appointed</b>	<b>arraignment</b>	190:3
<b>antianxiety</b>	40:18	142:2	<b>articles</b>
143:21	42:10	<b>arrest</b> 12:18	109:14
<b>Anu</b> 49:14	43:20	22:13 36:4	189:24
<b>Anupama</b>	<b>appointment</b>	113:11	190:1
48:25	115:4	126:16	<b>arts</b> 13:21
<b>anxiety</b>	170:19	128:8	<b>aspect</b> 34:12
118:19	<b>appreciation</b>	129:22	72:17
143:9	124:20	131:3	<b>aspects</b>
144:16	125:5	166:21	50:12
147:9	191:21	170:17	180:20,21
148:17	<b>appreciative</b>	174:20	<b>assert</b> 80:12
149:9	125:2	175:24	<b>assess</b> 54:18
<b>anxiety-coping</b>	<b>approved</b>	189:25	<b>assessing</b>
149:1	110:13	190:1	52:12
<b>anymore</b>	<b>approximately</b>	<b>arrested</b>	<b>assistance</b>
149:5	18:7	12:11	148:21
171:5	<b>area</b> 10:25	21:9,16,	<b>assistant</b>
<b>apartment</b>	11:3,6,22	18,21 33:1	14:9 84:4
10:5,22	127:5,22	35:14	170:10
<b>apologize</b>	148:11	90:12	<b>assume</b> 92:6,
165:7	174:9	121:1,12	19 113:14
173:20	177:9,21	164:5,12	117:11
<b>app</b> 136:18	<b>areas</b> 90:17	172:11	176:25
<b>argumentative</b>	99:14	174:6,11,	187:25
		15 181:6	
		189:24	
		<b>arresting</b>	



## LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Index: assumed..back

<b>assumed</b>	<b>attorney</b>	7:11 23:20	<b>aware</b> 57:23
77:19	25:24	26:15	60:10,16
172:11,12	26:18	27:17	69:10,16,
187:24	31:16	28:11	22 71:4
	77:22	55:24	76:18
<b>assuming</b>	78:19 79:6	83:10	77:9,11
9:10 31:22	98:18	119:4,24	79:1
131:25	110:18	120:8	81:15,19
<b>assumption</b>	111:19	179:17	94:22
82:9 132:8	113:2	183:3	95:4,25
<b>assured</b>	118:24	<b>audio</b> 109:25	96:1,2
137:4	120:4	110:6,16	100:15
<b>Athens</b> 17:8,	122:25	111:2	113:10,15
10,12	132:11,14	<b>August</b>	119:10
71:22	137:20	45:12,13	124:25
<b>Atlanta</b>	138:24	71:13	133:20
10:4,25	139:24	181:5	137:19
11:3,6,21	141:5	<b>Augusta</b>	138:23
44:3 52:3	142:3,15	148:6,7,	144:24
71:21	168:18	10,14,22	172:6,8
<b>attachment</b>	169:4		
191:10,23	171:11	<b>aunts</b> 11:21	<b>B</b>
<b>attack</b>	180:3,4,5,	114:8	<b>B-R-</b> 17:5
116:19	23 183:9	<b>authority</b>	<b>B-R-A-Y</b> 17:6
<b>attempt</b>	<b>attorney's</b>	79:1,14	<b>bachelor's</b>
89:25	120:6	<b>authorized</b>	13:20
113:5,6	167:7	80:14	<b>back</b> 13:25
131:3	168:11,17,	<b>authorizing</b>	20:10
<b>attempted</b>	21 169:2,	183:17	24:13
115:14	25 170:7	<b>autism</b> 64:1,	32:7,17,
<b>attend</b>	<b>attorney/</b>	5	21,23,25
23:19,21	<b>client</b> 71:1	<b>Avenue</b> 10:3	33:16
<b>attention</b>	77:23	<b>average</b>	35:16
127:18	78:20 79:3	30:15	36:5,7,8,
184:18,21	112:1	181:12	24 38:7,
	168:6		14,21
	<b>attorneys</b>		

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Index: backed..benefits**

39:9,23	<b>backed</b>	91:21	175:7,8,10	94:3 96:7,
45:7,21				15 97:15
47:3 58:10	<b>background</b>		<b>basic</b> 8:18	98:5,12
65:10,11	13:10		<b>basically</b>	99:9,14,17
66:17 67:2	138:7		43:7 82:17	101:17
86:18,20	<b>backlash</b>		161:4	103:19
87:21	116:1		<b>basics</b> 48:17	105:3,8,14
88:20,21	<b>backside</b>		<b>basing</b>	106:12
94:16 97:3	139:9		175:12	133:5,18,
102:25	<b>backwoods</b>			24 151:11
103:1,3	56:6		<b>basis</b> 26:13	164:1
104:15,23,			52:20 55:7	165:20,23
25 105:2,	<b>bail</b> 141:4		99:12	166:15
15,20	<b>balanced</b>		101:23	167:12,17
106:4	154:11		<b>Bates</b> 123:8	168:2
107:5,13				170:1
110:24	<b>Ballinger</b>		<b>bathroom</b>	186:4
114:18	7:22		127:16	190:9,21
122:11	176:11,13		<b>beaded</b> 124:1	192:6
126:22,23	186:15		<b>bed</b> 93:4	<b>behalf</b> 117:3
129:15	190:13,18,		<b>begin</b> 8:16	119:14
134:10	25 192:4		<b>beginning</b>	<b>behaviors</b>
137:6,14	<b>bar</b> 14:18		7:6 88:25	61:8,10
141:17	78:17		89:1,4	<b>belief</b>
147:5,7,	<b>barrier</b>		122:10	174:25
10,14	22:22 56:3			
148:3	<b>barriers</b>		<b>Begnaud</b>	<b>believed</b>
151:23	56:18		7:15,16	135:15
153:11			9:14 32:3	
168:1	<b>base</b> 8:15		59:5	<b>Bell</b> 39:1,
169:1	174:24		63:10,14	10
177:10	<b>based</b> 42:12,		66:18	<b>bending</b> 88:3
180:18	16 48:4		70:17,22	<b>bends</b> 92:24
184:2	69:11 98:9		78:1,22	
185:20	103:14		81:2,23	<b>beneficial</b>
186:14	113:21		84:8,13	143:10
189:4	148:6		86:7 87:7,	<b>benefits</b>
	171:17		9 88:9	34:11

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Index: betrayed..broad**

<b>betrayed</b>	179:21	<b>books</b>	119:23	18:7,15
40:2,5	181:10,19		120:4,6,14	<b>break</b> 8:24
150:14	<b>bizarre</b>	<b>boost</b>	89:22	9:1 63:11
<b>big</b> 52:24	166:21	<b>boosted</b>	90:3	66:16
54:16 94:7	<b>bizarrely</b>	<b>booth</b>	184:10	110:23
95:11	26:7	<b>booths</b>		121:17,18
188:13	<b>blah</b> 56:12,	158:24		151:9,14
<b>biggest</b>	13	<b>bother</b>	154:2	167:13
24:21	<b>blanket</b>	<b>bottom</b>	31:2	<b>breaking</b>
<b>bill</b>	33:22	<b>boundaries</b>		168:13
144:12,13	<b>blanking</b>	62:2,16,		<b>breather</b>
<b>billing</b>	28:21	18,22,25		90:2
144:10,19	<b>blends</b>	73:18		<b>Brian</b> 40:18
<b>bills</b> 150:16	<b>blocked</b>	<b>boundary</b>		<b>briefing</b>
<b>Bingham</b> 8:2	108:13	62:4		188:6
173:7,8	<b>blocking</b>	<b>bow</b> 176:14		<b>briefly</b>
176:8	97:2	<b>box</b> 69:4		29:15
<b>biopsychosocia</b>		<b>boxes</b> 48:19		173:10
1 46:20	<b>blue</b> 130:12	<b>bracelet</b>		<b>Brill</b> 39:20
<b>birth</b> 9:20	<b>board</b> 44:11,	125:25		<b>bring</b> 33:12
<b>bit</b> 27:15	23	<b>brain</b> 47:10		49:16,17
33:12	<b>body</b> 78:6	<b>brainstorm</b>		68:11,12,
34:16	87:23	51:25 52:3		14 78:7
36:20	90:16,25	<b>brainstorming</b>		89:17
44:15	93:12,13	50:4		181:16,21
54:12	106:17,19	<b>branch</b>		182:4
63:15 67:4	<b>bond</b>	71:21,23		184:18,21
89:10 90:4	140:10,13,	<b>branches</b>		188:20
102:20	20,24	71:18,21		<b>bringing</b>
103:12	<b>bondsman</b>	<b>brand-new</b>		84:5 147:7
114:23	141:4	42:5		<b>brings</b> 109:6
125:7	<b>booked</b> 129:9	<b>Bray</b> 17:3,4		<b>broad</b> 78:13
149:8	130:20			145:8
165:12	140:3,5,9			
168:14				

## LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Index: broke..care

<b>broke</b> 64:15, 17	<b>Butts</b> 129:2 130:20 136:4	106:24 108:13 122:4,7	6 28:14,16 33:5,16 36:8,10,
<b>Brookhaven</b> 10:23	138:15 139:7	134:4,7,22 135:2,4,7	11,24 39:2 40:2,9
<b>brother</b> 11:8,14 116:5,14	170:11,22 <b>buying</b> 10:9	151:17,20 155:13 167:20,23	43:1 45:8, 10,25 46:8,11
<b>brought</b> 36:4 38:10 65:9 188:11	<hr/> C <hr/> <b>call</b> 62:18 113:6	176:5 184:1,7, 13,16	47:18 50:15,20 51:1,7
<b>Brunswick</b> 71:22	140:21,22 141:4,11	185:6,20 186:8,11, 17,20,24	55:23 57:22 63:23
<b>buck</b> 142:10	145:15 147:6	192:11	71:17 72:23
<b>Buckhead</b> 14:18	<b>called</b> 36:13 51:12	<b>cameras</b> 76:19,24 77:1,7	73:19 111:22 112:11
<b>build</b> 54:6 96:22 183:16	74:24 141:5,8 148:20	80:1,8 81:21 82:25 97:2	115:20 119:21 120:7
<b>building</b> 58:18 183:14,15	163:13,14 169:5 172:13	185:2 <b>campus</b> 58:16	136:14 141:12,21 147:13
<b>buildings</b> 139:11	<b>calls</b> 115:8 117:19,20, 21	<b>cancelled</b> 22:1 118:18,20 119:1	161:5 179:11,13 180:6,7 181:14
<b>built</b> 48:4	<b>camera</b> 7:3 38:1,4 66:21,24	<b>capacity</b> 45:18 60:5,10 125:12	187:2 189:16 <b>car</b> 129:12 139:13
<b>business</b> 11:19 13:22 19:11 31:2 35:3 96:18,25 97:5 100:12,14	77:9,11 79:22 80:6,10,19 81:1 85:12 86:12,15 87:22 92:9 97:16,17	<b>capital</b> 16:12 18:8,11 24:22,23, 24 25:2,3,	<b>care</b> 43:18 150:24 181:25
<b>busy</b> 34:17			

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Index: career..check**

<b>career</b> 61:1	114:7	120:8,13	140:14
70:7,9	128:17,24	147:23,25	<b>chair</b> 153:6
178:17	131:17	148:1,3	159:20
<b>careful</b>	145:4	179:4,11	180:4,5
63:24	147:24,25	183:21	<b>challenging</b>
133:1,4	152:2	<b>cash</b> 33:12	146:9
<b>carefully</b>	155:8	<b>casual</b>	<b>chance</b>
133:7	161:4,13,	56:14,17	145:10
<b>Carolina</b>	14 162:7,	<b>casually</b>	<b>change</b> 40:13
111:17,18	10,20	55:25	<b>Channel</b>
<b>cartoon</b>	170:12	95:15	140:5
89:24	172:12,19	<b>caused</b> 92:25	<b>character</b>
<b>case</b> 21:22	175:14	<b>ceiling</b>	89:24
25:24	178:19	185:16	<b>charge</b> 82:11
26:1,10,18	179:1,3,7,	<b>cell</b> 12:18	135:7
27:13	8,9,12,13	83:23	<b>charged</b> 30:3
29:15	180:20	117:23	63:7,8
36:23	187:14,18	136:15,16	<b>charges</b>
37:14	190:10,11	140:9	38:20
46:11	<b>caseload</b>	141:19	39:4,6
47:4,6	72:4	181:21	121:9,13
48:20	178:25	188:15	142:4
49:20 50:5	191:8	<b>Center</b> 55:15	171:1,18,
67:24	<b>caseloads</b>	<b>centralized</b>	22 172:7
68:10,11,	26:14	44:24	<b>Charles</b> 7:19
15 71:11,	<b>cases</b> 18:2	<b>certification</b>	<b>Charlie</b>
25 72:11,	24:22	19:8,9	156:10
12,22	25:2,6,11,	81:10	<b>chat</b> 167:13
73:12,19	17 26:13	<b>certifications</b>	<b>chatted</b>
83:12	28:14,16	15:4	178:6
96:22	46:8 47:18	<b>Cesar</b> 187:20	<b>check</b> 54:14
108:23	48:6 50:2,	<b>chain</b> 141:11	188:22
109:20	4 52:1,3,5	<b>chains</b> 74:23	
111:19	73:7 74:12		
112:11	100:16		
113:1	111:13,16		
	114:20		

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Index: checked..college**

<b>checked</b> 68:4	<b>classroom-type</b> 132:4	21,23
	50:12	16:17
<b>checking</b> 48:18	<b>clean</b> 8:23	152:3
		154:11
<b>chest</b> 106:11,13	<b>clear</b> 69:14	168:2,4,6
	103:24	182:9
<b>child</b> 43:14	104:20	183:16
<b>children</b> 12:1	108:16	187:2
	116:4,16	<b>client's</b> 54:18
<b>choice</b> 24:25	117:3	<b>clients</b> 29:6
<b>choose</b> 32:17	150:2,5	41:19,24
37:15	175:21	46:23
91:10	<b>cleared</b> 69:4	52:13 53:9
108:18	<b>client</b> 18:4	54:2
<b>chose</b> 125:24,25	26:2,5,6	56:16,20
<b>chosen</b> 42:18	46:21	57:15,18
<b>Chuck</b> 7:21	47:7,9	61:6,7,17,
152:1	49:17	21 62:6,7
<b>citations</b> 12:15	51:2,7,10,	66:9,11
	12 52:17	75:5,11
<b>CJA</b> 27:16	56:3,19	76:8 89:7
28:11 29:8	57:7 63:6,	94:12
30:4	8,24 67:25	97:24
<b>claim</b> 142:17	70:25	109:17
<b>claiming</b> 145:4	76:20	112:16
	77:24	124:17
<b>class</b> 51:5	78:20	125:2
58:9,11,	79:13	162:14,18,
15,24	81:15	19 163:14
<b>classes</b> 14:19	96:20,25	182:15,16
23:15	98:14,20,	183:4,21
	21 100:13	188:4,19
	115:23	191:7,9,13
	116:7	<b>clinic</b> 16:15
	126:8	<b>clinical</b> 15:5,19,
	130:7	
	131:5,13,	
	19,20	
		<b>close</b> 10:10
		74:16
		<b>close-toed</b> 55:3,20
		<b>closed</b> 53:24
		<b>closer</b> 90:7
		<b>closeted</b> 52:18
		<b>clothing</b> 109:15
		<b>code</b> 109:24
		<b>codefendant</b> 187:10,13,
		14,17,24
		<b>cognitive</b> 54:18
		112:9
		<b>Cole</b> 7:21
		151:25
		152:1
		156:6
		<b>collateral</b> 148:10
		<b>collaterals</b> 112:18
		<b>collect</b> 47:1
		48:11
		<b>college</b> 13:17,18,

## LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Index: comfortable..confusing

19	communicated	completely	concluded
comfortable	64:2	46:13	192:14
44:19 54:5	117:13	106:9	concludes
56:20	163:12	145:19	192:8
75:14	169:22	152:20	condo 10:7
148:8	171:8	complex 82:1	conductive
154:10	communicating	complicate-	183:13
command	78:10,11	188:1	conduct
141:12	117:9	computer	48:13
comment 39:8	communication	68:14 86:3	conducting
62:10	78:6,7,9,	concept 42:4	84:18
63:19	12,14	concern	96:25
114:2	112:15	40:15	conductor
186:16	119:6	74:15	150:23
189:20,21,	123:5	80:19	conference
23 190:4,6	164:17	96:24	110:22
commented	189:15	97:21	152:9
176:13	communications	98:2,15,	184:4,7
185:4	71:2 77:24	16,17	conferences
commenting	78:19	101:19	23:20
95:16	79:2,16,18	126:11	50:14,15
comments	88:6,15	150:1,25	confidential
41:19	131:9,17,	155:22	183:18,23
42:17	18,24	concerned	191:17
61:2,12	134:21	53:5 89:5,	conflict
66:5,8	136:17	10 100:2	187:18
113:18,21	138:1,23	128:17,18	confused
170:6	162:15	137:2	101:5
186:20	191:17	187:6,23,	140:18
commissary	community	25	169:16
119:14	50:21	concerns	171:10
common 55:11	116:2	42:16 44:1	confusing
communicate	compared	52:4 100:1	44:3
117:12	108:6	155:1,12,	
118:7	complete	14	
	107:15		

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023 Index: Congratulations..correct**

<b>Congratulations</b>	<b>contents</b>	<b>contraceptives</b>	<b>copy</b>
19:5	156:3	12:24	70:2
<b>connected</b>	<b>context</b>	<b>contract</b>	122:17,25
16:22	51:20	28:13	190:7,8
50:21	63:19	<b>contracted</b>	<b>corner</b>
<b>connection</b>	81:11	27:16	185:10,16
191:4,7,	<b>continuance</b>	<b>control</b>	<b>Corners</b>
12,18,19	26:16	89:14	11:9
<b>considered</b>	<b>continue</b>	<b>conversation</b>	<b>correct</b>
80:25	16:19 35:6	39:5,7,20	12:16 23:9
81:5,8	90:6	40:23	31:7 59:1,
109:11	<b>continued</b>	41:13	21 60:18
<b>consult</b>	33:17,23	62:5,7	62:13
143:8	<b>continuing</b>	90:18	67:11
<b>consulting-</b>	14:24	91:25	69:13
<b>type</b>	20:18	107:16	73:14
180:8	102:24	135:13	77:18
<b>contact</b>	<b>contraband</b>	139:2	79:10,19,
113:5,9	69:18 70:6	169:18	20,23 80:4
118:1	83:22 84:5	171:18	81:13,14,
138:19	94:22	177:18	17 93:10,
153:17,23	95:25 96:3	<b>conversations</b>	19 98:4,11
156:16	97:5,6,9	40:23 43:7	99:11,20,
164:9,22	98:3,11	61:17	23 100:11
182:14,16	100:6,17,	98:19	101:4,24
183:4,10,	24 101:5,	112:13	102:10
18,23	7,10,12	141:19	104:6
184:3,11	110:11	166:5	106:16,17,
188:7,12,	117:24	167:11	24 107:4,7
20	128:8	168:25	121:7,9,
<b>contacted</b>	130:7	169:8	10,14
175:25	131:15,23	<b>convicted</b>	126:6
<b>contacting</b>	135:15,16	23:2	134:18,19,
175:23	167:2	109:14	24,25
<b>content</b>	188:23	<b>conviction</b>	136:5,6
126:25		69:13	137:20
			138:2,4,8,
			13,14,17,
			18 142:5,6



**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Index: correctional..customary**

144:22	<b>correctly</b>	<b>coursework</b>	156:8,10
152:18	27:19	16:4 60:4	163:17,21
156:25	61:19	<b>court</b> 7:13	<b>create</b> 56:14
157:2	91:16	8:19 9:23	<b>created</b>
158:14	114:2	37:22 86:8	40:15
159:3	179:5	96:10	160:1
160:2,5	<b>cost</b> 124:24	117:10	<b>credentials</b>
164:6	<b>council</b>	118:10,11,	19:18
167:9	36:13 37:7	16 122:13,	<b>credibility</b>
172:9,10	40:4 44:14	20 133:12	19:20
173:1,2	141:9	165:24	<b>credit</b> 33:20
175:11,12,	<b>counsel</b> 41:5	181:11	<b>crime</b> 26:4
24 178:17	124:11	183:17,22	<b>crimes</b> 59:3
185:23,24	151:9	190:17,21,	62:12
186:1		24	<b>criminal</b>
<b>correctional</b>	<b>country</b> 44:8	<b>Court's</b>	13:21
23:8 46:23	75:9	119:1	21:22
52:25	<b>counts</b> 11:5	<b>courthouse</b>	34:15
53:2,4	<b>county</b> 13:13	138:16	36:23
55:12,18	55:16 57:3	139:7	37:14 46:1
56:5 58:14	129:3	<b>courts</b> 25:8	58:9 61:5
60:6,8,12,	130:20	<b>cousin</b>	62:8,11
14 70:7,9	136:4	114:3,21	83:12
71:15	138:15	116:21	115:19
74:4,18	139:7	117:3	142:3
80:18 99:6	148:7	189:10,14	145:24
101:4	170:11,22	<b>cousins</b>	146:1
102:7	181:24	11:21	149:16
148:8,12	<b>couple</b> 8:18	114:8	<b>cuffs</b> 74:24
149:11	26:17	160:9	<b>current</b> 9:22
152:22	33:10 39:5	<b>coverage</b>	10:11,18
174:1	111:8	121:8	45:1
178:1,4,16	115:13	<b>COVID</b> 149:5,	<b>customary</b>
181:17	162:17	6 166:22	55:7 96:4
185:1	<b>courses</b>	<b>Cox</b> 7:19	
<b>Corrections</b>	23:16		
188:5			

## LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Index: cut..defense

cut 55:2,3	146:10	debt 33:20	16:12
	147:8	150:21	18:9,11
<b>D</b>	164:5,11	<b>December</b>	23:14
	174:14	13:23	24:23
<b>DA</b> 142:3	180:10,14	<b>decide</b> 36:24	27:10,21
170:10	<b>day-to-day</b>		33:5,16
<b>DA's</b> 138:2	43:5	<b>decided</b>	36:8,10,
		137:23	11,25 39:3
<b>dad</b> 161:22	<b>days</b> 39:5	138:4	40:3 43:1
<b>dad's</b> 161:25	137:6	148:19	55:23
<b>Dahlonga</b>	<b>deal</b> 25:21	<b>deciding</b>	71:18
11:5,6	53:14 54:1	46:15	72:23
13:13,15	55:22	<b>decision</b>	111:23
<b>daily</b> 101:23	65:14	42:11	119:21
<b>damages</b>	160:9	174:19	120:7
142:12	168:12	176:5	136:14
145:4	<b>dealing</b>	<b>deeply</b>	141:12,21
<b>danger</b>	51:18,20	147:21	160:17,18,
100:24	53:4,23	<b>defendant</b>	25 161:5
<b>data</b> 60:21	54:25	12:5	162:16
<b>date</b> 7:9	56:19	<b>Defendant's</b>	180:7
9:20	62:23	122:18	181:15
<b>dating</b> 64:9	75:14	<b>defending</b>	189:16
<b>David</b> 7:23	<b>dealt</b> 61:1	<b>defendants</b>	63:7
<b>day</b> 19:1	168:17	115:20	<b>defense</b>
35:13,17	171:6	140:17	36:13 37:7
46:22	174:3	152:2	40:3 41:21
47:12	<b>death</b> 46:16	175:20	42:8 44:13
53:12,13	51:9 58:22	<b>defender</b>	50:20 51:3
101:15	73:11 74:9	24:15,19	55:16
102:3	75:8	28:7 41:18	57:17
115:12	101:3,13	43:22	60:22
119:2	102:4	44:2,5	62:1,20
126:16	162:6	45:8,11,25	69:24
136:23	<b>Deborah</b>	141:9	70:25
	11:11	<b>defenders</b>	73:13

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Index: defensive..discovery**

78:4,5	37:12,14	<b>destabilizing</b>	170:12
84:21	42:24	145:18	<b>directly</b>
96:19,22,	47:22	<b>details</b>	26:20
24 97:23	48:24 51:3	47:19	117:14
98:16,17	129:3,10,	<b>detector</b>	174:12
100:16	12,14	68:9,24	<b>director</b>
113:4	130:20		16:14
117:1	139:9	<b>determine</b>	26:22 37:6
122:24	188:5	139:15	39:2 40:11
124:18	<b>depo</b> 29:3	<b>develop</b> 50:5	42:12,22,
146:20	<b>deposed</b> 8:7,	<b>diagnoses</b>	25 43:3,15
147:13	16	144:8,9,11	44:16
156:15	<b>deposition</b>	<b>diagnosis</b>	47:23 72:5
177:13	7:6 71:4	144:13,18,	112:25
183:19	87:1	21,23	141:20
<b>defensive</b>	192:9,14	<b>Diagnostic</b>	180:6
64:3	<b>depressed</b>	58:16,22	<b>directors</b>
115:21	33:6 162:7	<b>died</b> 102:8,	43:3
116:4	<b>depressing</b>	19 160:19	44:11,23
<b>deficits</b>	35:1	<b>difference</b>	<b>disability</b>
112:9	150:17	15:10	51:6
<b>degree</b> 13:21	<b>depression</b>	24:21	<b>disabled</b>
15:14 16:2	145:16	154:20	47:8 51:8
34:23	<b>Deriana</b>	<b>difficult</b>	<b>disagree</b>
45:15 80:2	180:15	34:9 178:2	99:18
<b>demonized</b>	<b>Derrick</b>	183:11	106:12
115:24	173:8	<b>difficulty</b>	<b>disciplinary</b>
<b>demonstrate</b>	<b>describe</b>	162:6	69:17
133:11	41:2 165:8	<b>digest</b> 47:3	70:1,8
<b>demonstrates</b>	166:7	<b>direct</b> 26:21	95:25
82:4	167:8	<b>direction</b>	<b>discovery</b>
<b>demonstrating</b>	<b>description</b>	43:10	41:5,6
133:13	157:23	118:23	83:12
<b>Dennis</b> 11:11	<b>desk</b> 136:16	158:24	84:14
<b>department</b>			145:5

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Index: discuss..Dubose**

155:11	144:17	166:14	<b>dress</b> 53:23
170:16,18	<b>dispute</b>	167:11	95:15
173:25	73:24 74:2	168:12,16,	<b>dressed</b>
174:7		18 169:1,	55:25
175:13	<b>district</b>	4,15,16	<b>driving</b>
<b>discuss</b>	24:15	170:19	150:25
89:15	25:8,16	171:6,8,14	<b>drop</b> 110:11
161:14	44:9 167:7	<b>Donnie</b>	172:20
188:6	168:11,17,	187:24	<b>dropped</b>
<b>discussed</b>	21 169:2,	<b>door</b> 53:24	38:21
65:12	25 170:7	57:6,8	39:4,6
70:15	171:11	59:12,15	121:9,13
77:16	<b>divulging</b>	75:23	142:4
89:15	131:21	113:7	<b>dropping</b>
129:19	<b>DOC</b> 82:10	127:6,13,	171:1
161:15	<b>documentation</b>	19 128:1	<b>drove</b>
168:3	22:5,24	153:25	141:17,25
<b>discussing</b>	23:1,5	154:14	<b>drugs</b> 52:11
87:5 90:2	48:10	155:19	<b>Dubose</b> 58:6
122:23	188:18	157:25	66:13
<b>discussion</b>	<b>documented</b>	158:2,3	67:6,16
53:2,20	48:9	159:7,9,	69:10
56:1 136:8	189:15	13,16	70:23
165:18	<b>documents</b>	<b>doors</b> 52:23	71:3,11
182:9	21:20	<b>Doss</b> 180:15	80:2,23
<b>discussions</b>	132:23	<b>double-check</b>	83:1,8
53:14	133:10,12,	49:21	84:18 85:2
55:10 61:3	13,16	<b>doubled</b>	87:3,20
142:3	145:13	13:21	93:3 98:3
175:3	155:7,11	<b>doubts</b>	101:3,12
<b>dismissed</b>	156:4	146:21	102:7
171:18,22	175:7,8,13	<b>draw</b> 124:19	109:21
<b>disparage</b>	181:24	<b>drawings</b>	110:1
116:20	182:7	160:11	111:2
<b>displaying</b>	<b>Don</b> 138:24		114:5
	139:1		

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Index: Dubose's..ensued**

123:5	117:11,17	108:6	<b>encouraged</b>
132:11,21	119:11	<b>elated</b> 147:7	51:16
134:13	120:11	<b>element</b> 34:5	<b>end</b> 30:10
136:20	123:5	<b>eligible</b>	90:7 122:1
139:25	126:1	15:25 51:8	169:11
141:6,16	136:18,19		<b>ended</b> 16:19
152:12	<b>earlier</b>	<b>else's</b>	<b>ends</b> 14:12
153:1,19,	91:25	100:12,14	<b>enforcement</b>
22 154:21	134:21	<b>embarrassed</b>	52:9 138:9
156:2,16,	135:10	64:20,24	<b>engage</b> 113:4
23 157:2,5	150:14	<b>emotional</b>	<b>engaging</b>
158:9,14	157:14	191:4,6,9,	56:17
159:3,14,	159:24	12,18,19	<b>Engleman</b>
25 162:21	164:4	<b>emotionally</b>	7:7,8,16
163:12	176:13	33:12 89:3	8:6,11
173:24	178:15	<b>employed</b>	9:19
176:2	180:12	81:17	11:11,13,
177:20	189:4	<b>employee</b>	15 71:2
179:1,3,15	<b>earliest</b>	40:21	128:4
181:3	161:22	42:23	152:1
186:19	<b>earned</b> 29:23	148:20	162:25
190:2	31:2	<b>employees</b>	163:3,25
191:13,15	<b>earnings</b>	42:9	166:4
<b>Dubose's</b>	29:21	177:10	167:13
165:9	<b>easier</b> 24:11	<b>employment</b>	173:8
185:20	<b>education</b>	16:19,24	176:12
187:10,13	14:25	20:5 22:22	<b>English</b>
189:7	20:19	24:10	13:22
<b>duly</b> 8:7	<b>educational</b>	42:25	<b>enjoy</b> 44:25
<b>dumbfounded</b>	13:10	45:10	<b>enrollment</b>
130:14	14:22	<b>encompass</b>	13:14
<b>dynamic</b> 56:2	<b>effect</b> 171:3	133:22	<b>ensued</b>
85:15	190:4	<b>encountered</b>	165:18
<hr/>	<b>effort</b>	186:24	
<b>E</b>	73:14,15		
<hr/>			
<b>e-mail</b>			

## LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Index: ensure..fabric

<b>ensure</b>	98:10	17:17	<b>Exhibit</b>	<b>explanation</b>
<b>ensuring</b>		41:12	122:12,18,	37:4
76:12		123:9	19,24	169:20
		144:2	<b>exit</b> 69:3	172:15
<b>entail</b>	49:13	<b>et al</b> 7:8	<b>expect</b> 62:6	<b>explore</b> 64:4
<b>entering</b>		<b>Eugenia</b> 9:19	<b>expecting</b>	<b>explored</b>
67:15			32:24	112:12
<b>entire</b>	42:25	<b>evaluate</b>	<b>experience</b>	<b>exploring</b>
72:23 89:1		47:11	43:21	58:10
178:17		<b>event</b> 80:4	57:20 67:5	112:8,9,11
<b>environment</b>		<b>eventually</b>	115:19	<b>expressed</b>
34:18		38:20	138:7	44:1
53:24		150:8	<b>experienced</b>	191:21
56:15		172:19	142:13	<b>extended</b>
96:14		<b>everybody's</b>	145:3	114:13
147:11		54:3	<b>experiences</b>	<b>extent</b> 34:20
<b>equipped</b>		<b>evidence</b>	48:8	73:19
75:18		121:4	<b>expert</b> 47:8	121:11
<b>Eric</b> 7:22		166:25	<b>expertise</b>	151:10
8:4		<b>examination</b>	138:8	<b>external</b>
165:20,25		8:9 124:12	<b>experts</b> 47:5	51:16
176:13		151:24	51:13	<b>extra</b> 33:12,
<b>escape</b> 98:4		156:7	<b>explain</b>	14,19 34:4
<b>escaped</b>		163:22	15:10	122:24
71:14		166:2	61:24	<b>extremely</b>
73:25		173:6	150:21	112:18
74:17		176:10	154:24	147:22
76:11		<b>examined</b> 8:8	<b>explained</b>	<b>eye</b> 153:17,
80:17 96:1		<b>excessive</b>	129:1,8,	23
97:7 100:2		140:15	21,22	
<b>escapes</b>		<b>exchange</b>	137:2	<b>F</b>
187:21		110:13	<b>explaining</b>	<b>fabric</b>
<b>essentially</b>		135:16	22:23,24	124:1,2
15:20		<b>Excuse</b>		164:24
16:25		148:14		

## LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Index: fabric-type..felony

<b>fabric-type</b>	81:12	95:15	28:8,9,12
159:25	82:10	<b>fall</b> 14:1	43:22
<b>face</b> 123:12	123:17	<b>familiar</b>	44:2,5,6,
185:23	127:6,23	25:16	10
<b>Facebook</b>	128:12,13	85:10	<b>feedback</b>
113:12,15	129:5	<b>families</b>	27:5
120:21	148:13	46:24	<b>feel</b> 56:20,
189:23	154:12	115:21	21 75:18
190:3,4,8	178:1,4	<b>family</b> 11:2,	76:2
<b>faced</b> 185:20	181:18	20 51:11	103:11,13
<b>faces</b> 126:4	182:9,10	66:8	115:22
<b>facilitate</b>	188:14,18	102:17	133:1,2
71:19	<b>facing</b> 75:7	111:7,12,	146:2
<b>facilities</b>	116:8	13,17	148:8
52:25	158:23	112:8,13,	149:14
53:3,17	<b>fact</b> 34:15	15,18	151:13
55:18	73:22,25	113:15	<b>feeling</b>
57:2,5	102:6	114:5,24	40:15 42:1
58:13,14,	116:23	115:23	149:8
23 123:21	132:21	116:2	<b>feelings</b>
148:9	166:23	161:23	162:9
149:12	170:20,24	189:7	190:19
152:22	180:22	190:2	<b>feels</b> 64:24
154:13	<b>Factory</b>	<b>father</b>	145:8
181:17,23	14:16	114:10	<b>feet</b> 76:7
185:1	29:24	116:6	88:18
<b>facility</b>	31:20	<b>fear</b> 148:18	91:16 92:8
46:23 53:9	147:3	<b>feature</b>	103:15
55:12 56:5	<b>fair</b> 42:15	156:3	107:18
67:14,25	43:9 44:25	<b>February</b> 7:9	108:4,19,
69:5,9	92:18	35:18	21 109:1,
74:21	100:8,25	172:3	7,15
75:20	101:11	<b>federal</b>	159:22
76:2,3,4,	121:6	24:15	165:8,9,14
19,25 80:3	<b>fairly</b> 50:21	27:10,21	<b>felony</b>
	78:13		150:10

## LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Index: felt..frames

<b>felt</b> 33:7, 21 40:1,4, 5 41:2 44:19 47:6,7 51:15 53:18 57:14,15, 18,19 64:2 74:21,22 75:5,19, 21,24,25 76:8 96:3 119:22 120:3 130:3,9,24 131:2 146:25 147:20,22 148:3 149:22 150:14,20, 21,22	<b>figuring</b> 48:21  <b>file</b> 29:16 30:20 68:13 72:13,17 160:17,18, 25 189:16 190:10,11  <b>fill</b> 72:2  <b>filling</b> 7:22  <b>film</b> 140:6  <b>filmed</b> 140:16  <b>finally</b> 22:4 170:15  <b>financial</b> 145:13  <b>financials</b> 142:15  <b>find</b> 19:1  <b>fine</b> 71:6 82:22 110:4 137:5 160:22 167:16  <b>finish</b> 63:13 122:15,23  <b>finished</b> 153:10  <b>fired</b> 22:20 72:22	<b>firsthand</b> 134:17  <b>five-minute</b> 121:17 151:14  <b>fixated</b> 66:2  <b>flight</b> 69:11  <b>flip</b> 68:16, 17  <b>flirtation</b> 66:4  <b>flirtatious</b> 61:2 66:8  <b>floor</b> 55:13, 21  <b>Florida</b> 29:9 50:23  <b>fluid</b> 188:16  <b>focus</b> 56:16  <b>focuses</b> 73:21,22  <b>folks</b> 85:21 142:8  <b>follow</b> 29:3 156:19  <b>follow-up</b> 39:17 173:10  <b>foot</b> 103:12,13 104:5,9,21 106:5 107:14,21	<b>forces</b> 146:25  <b>forensic</b> 28:16,19  <b>foreseeable</b> 45:4  <b>forgetting</b> 179:6  <b>form</b> 9:12 59:5 78:1, 22 81:2,23 84:8 94:3 96:7,15 97:15 98:5,12 99:9 101:17 103:19  <b>formal</b> 23:14,15 24:3 39:14 144:18,20  <b>forward</b> 151:4 169:10  <b>found</b> 18:24 83:23 141:6,13 149:17 167:2 171:13 172:24 190:5  <b>frame</b> 171:25  <b>frames</b>
---	---	--	--



## LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Index: frank...give

107:12	<b>full-time</b>	<b>gathering</b>	24:16 25:8
<b>frank-</b> 189:3	26:11	47:15	29:12
<b>frankly</b>	27:20	173:23	36:13 37:7
96:23	28:13	<b>gauge</b> 73:2	44:9 56:7
120:5	<b>fully</b> 25:5	<b>gave</b> 14:13	58:7,16,22
129:24	83:24	22:16,18	75:8 78:17
146:16	140:14	123:23,24	114:4,5
<b>free</b> 16:24	<b>Fulton</b> 55:16	130:12	<b>Georgia's</b>
124:24	<b>function</b>	144:24	32:4
151:13	112:14	160:2,4,14	<b>germane</b>
<b>frequent</b>	<b>functioning</b>	161:5	108:23
97:4	51:12	165:4,5	<b>gesture</b> 8:20
<b>freshman</b>	112:10	192:2	158:19
13:17,18	<b>funded</b> 44:10	<b>gearing</b>	<b>gestures</b>
<b>friend</b> 10:15	111:21,22	179:17	8:22
16:22	<b>funding</b>	<b>general</b>	<b>get-go</b> 116:5
<b>friendship</b>	44:21	32:22 50:7	<b>ghosted</b>
125:25	<b>funny</b> 63:22,	82:9,10	115:6
<b>friendships</b>	23 65:16	87:17	<b>gifts</b> 124:20
64:8	<b>future</b> 33:7	107:19	<b>girl</b> 64:13
<b>front</b> 87:23	45:3,4	112:5	65:3,4
157:2		138:12	<b>girlfriend</b>
169:11	<b>G</b>	155:15	64:14
188:13	<b>Galloway</b>	<b>generally</b>	110:14
<b>frozen</b> 186:5	180:24	11:3 59:7	<b>give</b> 21:23
<b>frustrated</b>	<b>game</b> 130:4	153:21,22	22:4 23:1
171:16	<b>garage-looking</b>	<b>generated</b>	34:1 35:7
<b>full</b> 9:17	139:12	69:25	82:17
14:19,21	<b>Gary</b> 8:2	<b>gentlemen</b>	103:21
26:13,14	<b>gate</b> 68:7	156:12	113:23
30:11,14	<b>gathered</b>	<b>Georgia</b> 9:23	115:1
36:5,7,8	132:24	10:4,23	123:19
72:4		13:15,19,	124:19
		25 14:4,23	125:4,24
		21:13	

## LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Index: giving..halfway

126:1,7	105:16	140:20	117:7
130:6	109:12		123:22
136:14	115:5,18	<b>great</b> 27:6,8	149:14
137:14	128:1	43:2,24	153:25
144:8	148:23,25	116:11	
145:9	176:12	148:23	<b>guesstimate</b>
147:3	184:23	<b>greatly</b>	30:19
157:22		102:21	<b>guest</b> 52:6
167:1	<b>gosh</b> 63:21	<b>Green</b> 7:25	<b>guidance</b>
169:20	<b>government</b>	85:25	53:22
188:5,19	28:8,12	163:19,23	<b>guide</b> 48:12
191:15,25	43:13,16,	164:1,2	<b>guidelines</b>
<b>giving</b> 97:8,	20 44:5,7,	165:15	47:13
19,20	11,15	<b>grew</b>	
98:13	<b>governor</b>	179:16,21	<b>guilt-</b>
124:15	42:13	<b>gross</b> 55:13	<b>innocence</b>
126:4	43:20	<b>ground</b> 8:18	46:13
159:25	<b>governor-</b>	130:16	<b>guy</b> 53:12
<b>glad</b> 187:11	<b>appointed</b>	<b>group</b> 17:15,	94:8 95:11
<b>glass</b> 127:8	42:10	21 34:12	<b>guys</b> 110:23
152:17,20,	<b>governs</b>	<b>growing</b>	123:9
23 156:25	47:18	112:17	166:17
157:5,7	<b>GPDC</b> 41:5	<b>guard</b> 55:5	167:12
158:3,4	<b>graduate</b>	152:14	
159:1	14:9 45:15	153:3,17,	<b>H</b>
182:21	<b>graduated</b>	24 154:3,	<b>habeas</b> 25:3
183:1,6,11	13:12,23	20 156:20	<b>habit</b> 8:20
184:11	14:2 45:16	157:4,7,22	<b>half</b> 18:12,
<b>good</b> 8:11,	<b>graduating</b>	159:5,13	16 57:9
12 20:21,	15:9	<b>guards</b>	87:14
24 21:4	<b>grand</b> 149:19	154:13	94:11
42:1,13	172:7,12,	<b>guess</b> 24:11	107:16
44:20	25	65:15	142:6
50:17	<b>grant</b> 44:10	113:23	180:25
66:18	<b>granted</b>	116:22	<b>halfway</b>
74:22			
90:10			

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Index: hall..high**

90:20	137:8,10	100:22	<b>hear</b>
<b>hall</b> 158:19	154:18		110:17,19
	187:8	<b>harmed</b>	116:12,18
<b>hallway</b> 77:6		101:21	176:17,18
157:11,18,	<b>happened</b>	<b>Harris</b>	183:13
22,24	19:4 22:23	180:22	186:3,4
158:4,6,	26:4 34:1		
10,16,18,	44:13	<b>head</b> 48:23	<b>heard</b> 39:3,5
20 159:15,	65:13	66:3 88:3,	79:8 82:6
16,19	71:16 73:5	7 90:14	109:21
<b>hand</b> 174:2	94:6	93:24 94:1	
	129:11	96:4 103:1	<b>hearing</b>
<b>handbook</b>	130:22	104:12	118:11,16
49:2	136:23	105:24	140:10,13,
	140:4	106:8,19	20,22
<b>handcuffed</b>	141:7	107:24	<b>heartbreaking</b>
74:23 76:6	145:20,23	109:13	40:8
97:17	150:8,19	116:23	
128:13,16,	187:5	137:7	<b>heavily</b>
22		165:11	180:9
<b>handful</b> 44:7	<b>happening</b>		<b>heaviness</b>
	33:21 80:4	<b>head's</b>	92:5,16
<b>handle</b> 26:15	106:24	102:25	
75:17	107:2	103:3	<b>heavy</b> 88:25
148:13	130:1,2,6	<b>headed</b> 40:4	89:2,9
<b>handled</b>	149:2		<b>held</b> 51:24
90:10	<b>happy</b> 43:10,	<b>heading</b>	
120:14	14 150:7	44:18	<b>helpful</b>
180:20	162:1	<b>health</b> 26:3	33:24
		36:14	<b>helping</b>
<b>handles</b>	<b>hard</b> 30:16	40:25	33:20
179:12	35:2 62:4	46:19	41:24
<b>hands</b> 91:8	110:17,19	142:17,22	116:7
108:17	146:5,6	143:24	
	150:18,21	144:12	<b>helps</b> 19:22
<b>happen</b> 26:19	151:5,6	145:2	
33:13	183:13	150:4	<b>high</b> 13:11,
61:14			12,13,16
76:12	<b>harm</b> 60:6	<b>healthy</b>	53:24
100:9	98:3	33:11	57:24
			58:6,25

## LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Index: higher..importance

59:7	home	53:7	hours	15:24	23	149:22
64:13,14		115:1		18:6 30:8,		175:25
67:15		141:25		13,17		187:4
76:13,16	honest	59:22		49:25	ideas	50:4
94:19		110:15	house	10:5,	identification	
96:5,14		152:19		6,8,12,13		122:13,20
99:7 100:1						
101:23	honestly		housed		identified	
102:3		66:7 82:12		183:21		26:2
109:13		83:24	housekeeping		identify	
144:16		125:1		122:16		46:19,20
		163:9				
higher 59:2		164:13,19	huge	51:6		47:5
highest		165:3		150:1		51:10,13
19:18		175:17,18	Human	55:15		63:25
hire 16:25		184:25			identifying	
150:13		188:25	hurry	177:16		165:23
		189:3				
hired 39:9			hurt	91:13	illicit	
179:3	honesty			109:2		52:11
		42:17	husband		illness	13:5
hiring 47:8,				116:6		
11	hooked				immediately	
		148:22	hustle	17:2		15:17
historically						
100:15	hoping		hypothetically			18:21
		110:13		62:23		73:7,8
histories		114:25				145:21
112:16						149:25
history	horrible			I		179:4
24:11 26:5		116:10	idea	33:21	impair	13:1,
41:17 64:9	horrifically			39:13	6	
142:14		145:25		44:14		
				77:12	impaired	
hit 86:23	hosted	50:18		82:12,21		54:10
hitting	hotel	148:21		86:2,6	implementing	
48:15 56:6	hour	30:4,7		97:16,17		37:8
		87:14		109:13		
holding				125:21	importance	
140:9	hourly	17:14		128:6		76:16
		30:2		141:10,22,		

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Index: important..initially**

<b>important</b>	158:15	<b>indict</b>	101:14, 20
41:10	168:10, 22	149:19	102:18
112:19	173:18	166:24	<b>informally</b>
<b>impression</b>	174:22	<b>indicted</b>	144:14
95:7	189:22	21:23	<b>information</b>
116:21	<b>incarcerated</b>	40:20	22:13
125:15	148:6	149:18	25:17
191:22	<b>incident</b>	167:4	31:14
<b>impressions</b>	145:3	169:6, 14	47:16
103:22	<b>include</b>	170:15	48:21
<b>inactive</b>	101:2, 7	172:22, 23	54:7, 20
22:8	160:11	<b>indicting</b>	56:23
<b>inappropriate</b>	<b>included</b>	170:2	67:14 82:4
41:20, 25	101:3	<b>indictment</b>	83:7 95:22
61:1, 11,	<b>including</b>	36:11	96:21
12, 25	11:20 34:4	37:10	109:23
62:10	70:10 78:4	38:11	110:11
63:20 66:5	101:4, 8, 14	40:22 43:8	112:19
117:6	113:14	150:1, 11	114:9, 11
125:10	<b>incredibly</b>	166:8, 11	115:1
132:10	40:2 132:9	169:10	120:24
169:2, 24	145:17	170:8	128:21
<b>inaudible</b>	183:12	172:1, 5	131:5, 21
20:8 30:13	<b>independently</b>	<b>indigent</b>	132:2, 6, 24
31:16	44:12	41:24 42:8	133:2
39:20	81:17	<b>individual</b>	136:10
45:21 49:9	<b>indicating</b>	43:5 74:16	137:3
57:11	84:4	168:16	<b>informed</b>
74:14	109:22	<b>individual's</b>	166:13
82:1, 13	120:24	170:14	<b>infractions</b>
85:25	121:9	<b>individually</b>	70:8
87:10, 11,	188:11	161:11	<b>initial</b>
12 88:10	<b>indications</b>	<b>individuals</b>	84:17
95:13	191:16	54:9 97:2	173:25
112:25		100:6	<b>initially</b>
123:11			48:2 71:10

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Index: injured..involved**

72:10	<b>ins</b> 107:15	78:10	<b>interruption</b>
179:4	177:25		37:21
183:2	<b>insanity</b>	<b>interaction</b>	
<b>injured</b>	36:15	42:21	<b>interview</b>
101:20	<b>inside</b> 68:19	56:18, 22	51:11
<b>injuries</b>	101:15	164:9	52:17
60:6	128:14, 15,	177:3	108:19
<b>injury</b> 47:10	16 154:4	178:6	115:18
101:3, 13	<b>insomnia</b>	187:16	148:10
102:4		<b>interactions</b>	189:17
<b>inmate</b> 60:11	<b>instances</b>	40:20 64:7	<b>interviewing</b>
97:4, 6	95:24	79:13 83:8	47:1 54:1
123:17	118:10	96:20	<b>interviews</b>
125:15	<b>institutions</b>	97:24	48:14
187:9, 19	178:16	98:20	49:16
<b>inmate's</b>	182:18	110:2	<b>introduce</b>
119:23	<b>instructed</b>	113:22	7:12
120:4	55:2	177:6	<b>invested</b>
<b>inmates</b>	<b>intellectual</b>	178:8, 11	42:7, 9
53:23	51:6	<b>interactive</b>	44:17
54:25 59:3	112:10	50:9	<b>investigates</b>
60:7, 15, 25	<b>intellectually</b>	<b>interchangeabl</b>	46:9
100:17, 23	47:7 51:8	<b>y</b> 46:4	<b>investigation</b>
119:11	<b>intend</b> 45:3	<b>interest</b>	83:8 110:2
120:15	<b>interact</b>	41:23	111:6
123:19	53:23	<b>interested</b>	139:15, 18,
178:2, 15,	61:20	19:16, 17	22
20, 23, 24	<b>interacted</b>	<b>internal</b>	<b>investigator</b>
181:17	42:25	51:15	46:2, 3
<b>innocent</b>	61:22	148:3	73:20, 22
146:2	124:23	<b>interned</b>	180:22
<b>inputting</b>	177:5	55:14, 16	<b>investigators</b>
49:19	<b>interacting</b>	<b>interrupted</b>	55:24
<b>inquiry</b>	54:5 62:19	173:20	120:1
79:23		<b>interrupting</b>	<b>involved</b>
		8:21	

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023 Index: involvement..justification**

12:4 43:4	<b>items</b> 101:8	164:25	176:21
52:9 70:5	123:21	<b>job</b> 19:22,	<b>JPAY</b> 118:5,
71:10 74:3	125:16	23 22:20	23 119:4,
81:20	164:25	27:4,20	8,10
82:24 83:7	188:24	39:23 40:7	120:10
174:6		41:14	122:23
180:10,21	<b>J</b>	45:1,17	123:5
<b>involvement</b>		48:16,18	<b>judge</b> 26:19
174:18	<b>Jackson</b>	49:18	187:7
<b>IQ</b> 47:9	57:23	50:13,17	
<b>irons</b> 97:18	67:5,11	75:13	<b>judges</b>
108:1	70:10	90:10	25:11,15,
<b>issue</b> 70:13	76:13,20	98:23	19
95:5	81:13,16,	99:4,8,23	<b>July</b> 118:17
120:21	19 82:5	114:16	<b>jump</b> 66:16
131:23	129:4	146:14	<b>jumped</b> 45:8
135:15	135:9	147:21	<b>juncture</b>
154:7	<b>jail</b> 148:7	148:4,18,	93:15
<b>issues</b> 13:4	<b>jails</b> 57:3	25 149:10	<b>June</b> 71:16
18:3 26:3	181:24	150:2,19	156:16
27:4 43:25	<b>Jamie</b> 17:3,4	<b>John</b> 11:15	160:19
44:22	<b>January</b> 15:7	<b>joint</b> 13:14	<b>Juneau</b> 9:23
46:19,20	16:2 18:20	<b>Jonathan</b> 8:5	<b>jury</b> 11:16
51:19	24:16	166:1,5	46:15
52:4,21,24	27:23 33:1	168:19	149:19
53:2,10	37:1 43:23	169:8,9,	172:7,13,
60:23	<b>jeans</b> 56:7	12,19	14,25
81:10	<b>jeopardy</b>	170:13,20,	
96:2,3	41:14	22,23	<b>justice</b>
97:5 100:6	<b>Jerilyn</b>	171:1,11,	13:21 58:9
112:2	39:1,10,20	23	61:5 62:9,
142:18	<b>Jerry</b> 180:6	<b>Jordan</b> 8:3	12
145:2	<b>jewelry</b>	173:9,12,	<b>justification</b>
149:9	123:18,20	14 175:23	80:5
161:23	124:15	176:3	
<b>item</b> 124:11		<b>Jose</b> 7:23	

## LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Index: K-E-A-R-N-S..laughing

	54:23	177:15,25	<b>knowing</b> 48:5
<b>K</b>	55:8,19,21	178:2	62:15,18,
	57:10	180:8,17	21 118:20
<b>K-E-A-R-N-S</b>	64:5,16	183:8,14	146:15
26:25	65:4,14	185:4,18	149:15
<b>Kearns</b> 26:22	66:2	188:17	<b>knowledge</b>
<b>Kemp</b> 40:18	68:17,19,	191:23	70:4 82:3,
	22 71:19	<b>kinds</b> 23:20	23 83:2,4,
<b>Kennesaw-</b>	72:1,5,8	52:10	6 84:17,23
<b>woodstock</b>	73:18	54:2,9	99:22
11:8	87:13,16,	75:15	120:24
<b>key</b> 59:20	22 89:15,	101:9	121:5
110:23	17,22	139:10	134:17
<b>keys</b> 127:13	90:2,3,7,	<b>knew</b> 56:5	135:6,11
	12,17	57:15,16	138:6,13,
<b>killed</b> 75:6,	111:15	70:7 72:5	25 152:7
10 80:17	112:5,8	75:1,10,11	174:17
116:14	115:6,7	80:9 84:12	175:11
<b>kind</b> 11:7	118:12,25	89:8 97:8,	
13:10	120:2	19,20	<b>L</b>
14:11	125:19	112:25	<b>lack</b> 13:5
15:24 17:1	127:5	114:24	169:20
19:13,19,	128:7,23	118:14,15,	<b>language</b>
25 25:13	132:18	16 128:5	62:1 78:6
26:1,7,9,	140:6	130:7	<b>large</b> 57:17
12 27:14	141:11	132:20	155:11
34:11,12,	144:10	134:22	<b>larger</b> 20:4
17 36:17	145:9	137:9,15	40:3
39:8,9	146:4,23	149:20	146:25
43:16	147:3,19	150:13,15	<b>latest</b> 32:24
44:1,15	149:4,21	163:1	83:25
45:7 46:11	153:6,11	166:25	<b>laugh</b> 92:25
47:18	157:9	167:1	<b>laughing</b>
48:2,3,12,	160:9	177:12	92:21 93:5
15 50:1,3	162:5	<b>knock</b> 113:6	
51:15,25	171:1,8	<b>knocking</b>	
52:6,12,17	173:22	52:22	
53:10,13	176:15		



## LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Index: Lauren..life

<b>Lauren</b>	61:8,10	97:18	<b>letting</b> 39:9
142:22	89:20	<b>legal</b> 12:3	<b>level</b> 15:7,
144:5	141:7	23:11,17	18 19:18
148:22	<b>learning</b>	24:3	58:1
<b>law</b> 52:9	183:8	39:21,22	106:16
79:11	<b>leave</b> 33:2,3	41:5	<b>LGBT</b> 52:15
138:9	35:8,12,23	77:20,25	<b>license</b>
<b>lawsuit</b> 12:7	36:2,3	78:17,25	16:10
190:12	72:1,10	80:7,11	20:8,21,24
<b>lawyer</b> 23:22	73:3	100:12,13	21:7
<b>lawyers</b>	145:22	129:24	<b>licensed</b>
109:23	146:8	130:8	15:12
138:4	180:17,18,	135:5	19:25 20:1
	19	154:10	34:23
<b>laypeople</b>	<b>leaving</b>	162:11	<b>licenses</b>
46:5	127:4	165:1	15:3
<b>lead</b> 111:19	<b>led</b> 126:15	167:14	<b>licensure</b>
113:2	<b>left</b> 18:8,	183:5	15:6,8,13,
118:24	11 27:13	<b>legally</b>	18,22 16:3
132:11	77:5	80:13	18:19,25
141:5	103:12	<b>legitimate</b>	19:22
180:3	104:4,5,9	100:1	20:15
<b>leader</b> 43:10	105:6,21	<b>length</b> 172:5	21:2,12,25
<b>leading</b>	106:5	<b>lessons</b> 48:7	22:20
180:25	108:15	<b>letter</b>	<b>licensures</b>
<b>lean</b> 153:11	157:7,12,	22:18,19,	15:11
<b>leaned</b> 93:21	15,16	23 84:4,10	<b>lied</b> 40:5
<b>leaning</b>	159:6	162:23	<b>life</b> 12:4,
93:4,17,18	162:15	163:4,7,8	15 33:22
107:24	171:15	<b>letters</b>	46:16
<b>learn</b> 48:17	185:10	15:16	64:3,6
111:24	<b>left-hand</b>	161:2,3,5,	65:1 115:1
128:20	107:6	8,9,12,13,	121:21
<b>learned</b> 48:7	<b>leg</b> 69:1	17 162:5,	143:23
	74:23	17,18,21	146:5

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Index: lifetime..lot**

147:1	138:8	lobby 76:25	28:15,16
150:23	lint	127:5	29:10,11
151:4	130:15,17,	177:9,21	33:7 44:19
lifetime	18	local 91:8	46:24
48:5	lips 155:17	located	49:18 50:1
lifted 92:5	Lisa 29:10	76:19 80:2	51:14,15
108:4	listen	84:4	52:13
lifting	110:20	locked	53:1,25
107:21	listened	59:17,18	54:1,2,8,
light 96:2	109:25	80:16,22	17 56:1
light-hearted	110:5,16	127:7	58:23
90:4	174:21	long 9:25	61:6,9,15
lighten 92:2	LISTSERVS	10:17 22:8	62:3,8
lightened	50:22	26:5 32:23	64:1,8
92:4	literature	72:12,16	89:18,19
lighter	13:22	73:4 87:14	94:6 101:9
92:17	litigate	89:4	108:16
188:16	137:10	142:24,25	112:12,13,
lighters	litigation	143:2	16 114:7,
188:15	137:16	145:14	10,12
Lily 7:7,16	live 10:21	156:24	115:19
8:6 9:19	11:3,4	177:15	117:1
72:8 90:10	lived 10:22,	longer 40:11	118:19
125:17	24 61:7,9	43:19	123:7
162:25	114:3,4,5	longstanding	124:24
163:3,9	lives 17:8	145:16	127:1
limit 168:4	61:7,9	looked 22:21	128:24
limited	living 30:16	53:21	136:17
168:5	LLC 27:12,	93:24 94:5	137:3
lines 23:16	15,24 28:1	103:17	142:13
55:9 61:3	29:7,16,22	156:22	144:11,17
119:15	30:3,21	157:14	148:3
125:9	35:3	lost 22:20	156:25
		lot 14:12	158:3
		15:15 17:1	161:22
			164:14
			173:22
			174:3

## LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Index: lots..material

182:8	39:8	116:4,15	<b>manufacturing</b>
185:1,19	41:16,19,	119:13	130:25
<b>lots</b> 64:6	21 42:11	123:17	131:3
<b>loud</b> 29:19	61:1,11,12	125:14,16,	<b>map</b> 47:4
<b>love</b> 40:9	63:19 76:2	17 127:16	49:20
113:19	101:8	151:3	<b>March</b> 172:3
189:8	111:2,11	153:23	<b>mark</b> 7:16
190:15,23	114:1	187:8	19:9
191:1	117:2	<b>makes</b> 9:7	122:17
<b>loved</b> 40:7	123:20,25	65:4	140:5,16
116:19	125:22	<b>makeup</b> 55:2	141:7
147:21	142:17	<b>making</b> 97:22	<b>marked</b>
<b>loving</b>	150:2,5	124:5	122:12,19,
116:14	160:21,23	125:16	23
<b>low</b> 55:3	165:1	153:17	<b>marker</b> 86:22
<b>lower</b> 15:7,	189:20,21,	<b>male</b> 52:13	<b>markers</b> 86:5
18	23 190:3,6	53:23	<b>marketplaces</b>
<b>LPC</b> 142:22	<b>mail</b> 160:7,	<b>man</b> 80:16	123:22
143:5	9	<b>manage</b> 81:12	<b>marks</b> 163:1,
<b>luck</b> 40:10	<b>main</b> 58:16	<b>management</b>	2,3
<b>ludicrous</b>	69:5 76:24	13:23 43:5	<b>married</b>
128:10	127:6,23	177:1	11:24
<b>Lumpkin</b>	179:17	178:21	<b>MARTA</b> 141:25
13:13	<b>maintaining</b>	<b>manager</b>	<b>Mary</b> 11:13
<b>lunch</b> 63:16	42:13	32:22	<b>Maryjane</b>
121:20	<b>major</b> 29:6	33:25	7:25
<b>M</b>	<b>majored</b>	<b>managing</b>	<b>master</b> 15:13
	13:21	178:1	137:11
	<b>majority</b>	<b>manner</b>	<b>master's</b>
	177:7	61:20,23	14:1 15:14
<b>Macon</b> 71:22,	<b>make</b> 48:14	118:1	16:1 34:23
23 180:4	54:14 56:1	<b>manufactured</b>	<b>material</b>
<b>mad</b> 91:5	62:9 68:18	146:23	124:3
<b>made</b> 30:16	79:23 98:2		
	103:14		
	113:21		

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Index: maternal..memories**

<b>maternal</b>	97:1 98:1,	<b>medical</b> 13:4	<b>meetings</b>
189:14	7,13,24	46:25	52:20
<b>maternity</b>	99:1,10,	145:11	61:16
72:1,9	12,16,19,	<b>medication</b>	65:13
73:3	21 101:18	143:9	111:25
180:16,18,	102:12,16	<b>medications</b>	132:4
19	103:20,25	12:23 13:1	156:2
<b>matter</b> 7:7	105:5,9,	143:4,24	176:2,4
21:3,4	13,16,19	<b>meds</b> 143:7,	179:22
122:16	106:14	21	<b>member</b> 61:25
<b>max</b> 53:24	121:16,24	<b>meet</b> 54:19	68:2 69:24
57:24	122:14,21	115:14	96:19
58:7,25	133:6,21	116:24	115:23
59:7 67:15	134:1,11	158:9	116:2
76:16	151:7,12	170:22	141:16
94:19	<b>meaning</b> 72:3	171:5	146:19
96:5,14	78:13	182:25	177:12,20
99:7 100:2	124:24	185:17	180:19
101:23	173:24	188:4	183:19,23
102:3	<b>meant</b> 78:13	<b>meeting</b> 37:2	<b>members</b> 11:2
109:13	<b>measure</b>	51:24,25	51:11 66:8
<b>Mcgovern</b>	154:17	59:14	67:18
7:17 8:10,	<b>measures</b>	64:10	102:18
13 9:10,	56:25 57:4	100:12,13	111:13
15,16 32:6	81:21	112:7	112:13
38:8 59:6	82:5,11	118:10	113:16
63:12,15,	<b>media</b> 7:6	152:10,11,	114:24
17 66:15	113:11	15,17,25	124:18
67:3 71:6,	120:21,25	153:18	136:21
7 78:15,24	121:11,12	154:21,22	156:14
81:4 82:1,	122:2,10	155:1	165:1
2 84:11,15	129:13	158:12	183:5
85:20	139:6,16	159:2,10,	<b>mementoes</b>
86:2,19	141:8	14 161:19	124:20
87:2,12,18	175:19,23,	171:12,13,	<b>memories</b>
88:11	25 190:1	15,21	116:12,13,
94:15 96:8			17,18

## LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Index: memory..money

161:25	<b>messages</b>	63:24	28:13
162:1	136:20	141:20	29:9,12
<b>memory</b> 68:5,	<b>messed</b> 105:9	<b>minimum</b>	30:6 46:2,
6 74:25	<b>met</b> 8:14	31:22,25	6,8,17
87:13,16	113:2	<b>minor</b> 12:14	47:19,22,
119:6	115:16	<b>minored</b>	23 48:1,
157:11	152:5	13:22	14,23
158:3,4	153:22	<b>minute</b>	51:1,24
159:4	156:11	104:25	52:1 55:24
161:19,22	171:6	107:10	61:16
175:4,6	<b>metal</b> 68:9,	118:18	65:12
182:2	24 124:6	129:16	71:24
185:8	181:22	<b>minutes</b>	72:5,9,17
189:10	<b>mid-february</b>	110:17	73:20
<b>memos</b> 189:19	147:6	128:12	112:2
<b>men</b> 55:6	<b>mid-november</b>	129:5,18,	113:1
<b>mental</b> 26:2	36:9,21	20 178:7	147:12,24
36:14	<b>mid-september</b>	<b>mischaracteriz</b>	148:1
40:25	83:21	<b>ation</b> 84:9	155:9
46:19	<b>Mike</b> 7:21	<b>mislead</b>	161:16
142:17,21	152:3,4	91:24	180:11,15
143:24	<b>mill</b> 127:2	<b>missed</b> 103:8	183:15
144:12	<b>Milledgeville</b>	<b>mission</b>	<b>mix</b> 152:20,
145:1	13:20	44:17	21
150:4	<b>mind</b> 63:10	<b>misutilized</b>	<b>mom</b> 113:3
<b>mentioned</b>	73:24 74:2	155:23	<b>moment</b> 22:2
40:13	90:1 98:13	<b>mitigating</b>	120:20
127:5	109:6,18	74:8,14	130:24
145:5	154:19	<b>mitigation</b>	131:2
175:16	<b>mindful</b>	16:14	132:6
180:12	54:12	24:20	163:17
184:24	89:13	25:5,25	<b>Monday</b> 33:18
187:11	<b>mine</b> 10:15	26:12	<b>money</b> 33:14,
189:6	16:22	27:12,25	19 34:4
<b>message</b>			119:22
118:25			120:4,6,

## LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Index: monitoring..needed

11,14	177:4,11,	37:11	
151:3	22 178:9,	65:7,10	N
	12	128:7	
monitoring		150:3	named 180:23
80:20	morning	184:11	names 11:10
month 18:23	8:11,12		135:24
181:10	126:20	movement	160:9
		103:16	175:16,18
monthly	mornings	108:6	179:24
14:13	126:21		
50:25	Moss 8:1	moving 9:24	narrative
51:24	136:1	93:14	22:14
52:20	164:3,4,9,	MS- 14:23	narrow
months 22:9	15,22	MSW 14:23	159:15,16
26:17 36:4	mother	MTU 178:20	Nathan 7:8,
37:11	112:21		18 81:16
42:2,6	113:3	multidisciplin	82:24
71:16	114:9	ary 50:8	110:7
72:17	116:6	multiple	120:24
95:18		71:18	127:24
115:13	motion	111:11	128:4
116:25	153:10	114:20	129:17
143:1	motivation	139:3	138:25
144:6	41:23	141:19	175:15
146:9	motives	murder 74:3	190:5
147:23	131:1		
150:9	mounted	murdered	national
172:17	185:13,14	71:15	50:20
179:9,10		74:17	
	mouths	murderer	natural
mood 89:22	155:14	109:14	108:6
90:3			neck 91:8
	move 42:19	murderers	92:13
mood-wise	98:25	75:12	
89:17	126:14,17		needed 28:14
Morales 7:24	151:4	murders	47:6 56:10
84:3	153:6	174:1	68:14 69:3
110:10,12	169:10	mute 176:20	72:1 76:12
135:8			89:7,8
176:21	moved 10:19		90:5 97:24

## LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Index: negative..offended

148:19	noncapital	November	objections
154:17	191:8	16:21 36:9	9:12
negative	nonprofit	126:15	obliterates
27:2,5	44:8,10,20	149:17	87:22
178:8	nonprofits	156:17	observe
neglect	44:22	169:5	134:12
112:17	nonresponsive	172:11	observed
neighbors	98:25	181:7	100:7
46:25	normal 141:2	number	obtained
neuropsych	North 13:15	12:18,20	170:16
47:11	111:17,18	123:9	obvious 41:6
news 60:21	Northern	152:2	obvious-
115:24	24:15	181:2	144:16
140:6	25:8,16		occasionally
nice 33:19	44:9	O'BRIEN 8:4	117:21
149:13	notebook	165:20,22,	occupied
Nicholas	68:10,11,	25 166:1,3	33:11
11:15	15 78:7	167:5,16	occur 25:1
Nichols 93:3	128:17,24	168:9	100:18,19,
Nicki 189:11	155:9	170:3,5	20
	160:6,11	173:4	occurred
night 64:18	noted 126:1	object 59:5	66:6
nights 33:18	notice 94:8	78:1,22	134:18,25
Nikes 94:9,	183:25	81:2,23	135:3
10,17,23	184:6	84:8 88:9	152:10
Niquita	noticed	94:3 96:7,	occurring
189:11	103:8	15 97:15	88:5
Nix 7:19	127:21	98:5,12	147:17
156:10	184:13	99:9	October
Noah 7:25	notification	101:17	10:19
nod 8:20	169:20	103:19	odds 14:12
non-capital	notified	objection	offended
24:22	139:15	70:17	131:6
	169:15	99:13	

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Index: offense..owner**

<b>offense</b>	25 170:7,	<b>officially</b>	<b>operates</b>
57:22	11 179:12	180:13	44:12
73:23	180:4,7	<b>officials</b>	<b>opinion</b>
	181:15	98:22	78:25
<b>offenses</b>	183:20	128:20	140:23
75:16	187:2		
<b>offer</b> 16:24		<b>older</b> 11:8	<b>OPS</b> 81:17
<b>office</b> 16:12	<b>officer</b>	<b>Omotayo</b> 37:6	82:4,6
18:9,11	57:6,10,12	39:7,8	83:7
23:14,21	59:11,15,	40:4 43:2	135:9,23
24:23	20 75:22	150:2	173:17
25:24	77:3 97:18		<b>options</b> 20:4
27:10,21	100:7	<b>on-the-job</b>	167:14
33:5,16	106:23	50:9	
36:8,10,	127:13	<b>one's</b> 118:22	<b>oral</b> 12:24
12,13,25	129:2,8,11	<b>one-on-one</b>	<b>order</b> 16:3
39:3 40:3,	138:10	183:10	54:19
25 43:1	152:14	184:10	117:10
46:2	153:2,8,	<b>one-on-ones</b>	133:4,17,
55:16,23	18,24	55:1	20 183:17,
65:11 68:8	154:3		22
71:18	155:19	<b>ongoing</b>	<b>original</b>
72:3,24	157:12	32:18	65:10
79:11	<b>officers</b>	<b>online</b> 123:8	<b>Outlook</b>
111:23	23:8 53:4	139:23	136:18
119:21	60:6,15	<b>open</b> 19:11	<b>outs</b> 107:16
120:7	71:15	115:17	177:25
136:14	74:4,18	128:2	
138:1,2	75:2,24	<b>open-toed</b>	<b>outset</b>
141:13,21,	80:18 99:6	55:12	171:17,20
23 147:19,	101:4	<b>opened</b>	<b>overhear</b>
20 150:4	102:7	27:12,18	154:15
160:17,19,	127:25	<b>opening</b> 25:1	<b>oversaw</b> 82:4
25 161:5	132:18	<b>operated</b>	<b>overwhelming</b>
162:16	135:21,22	28:1	147:9
167:8	136:4		<b>owner</b> 28:4
168:12,17,	174:1		
21 169:2,	177:16		



## LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Index: owns..people

<b>owns</b> 10:15	<b>paperwork</b>	<b>pass</b> 142:9	<b>penalty</b>
	38:16		46:10,14,
<b>P</b>	144:10,25	<b>passed</b>	16 51:9
		18:21,24	72:14
<b>p.m.</b> 86:11,	<b>paralegal</b>	19:3 70:23	73:11,21
18 122:2,	24:1	97:6	74:9 75:8
11 134:3,	<b>paralyzing</b>	130:12	162:7
10 151:16,	148:17	<b>past</b> 48:7	
23 167:19	<b>paramount</b>	65:6	<b>people</b> 17:1,
168:1	76:16	160:19	25 34:18
186:7,14	<b>parents</b>	<b>pat</b> 69:2	36:15,16
192:9,14	11:4,10	<b>paternal</b>	42:18
<b>paid</b> 14:12	<b>park</b> 67:21	189:14	43:25
16:22	115:16	<b>path</b> 127:23	50:21 53:8
119:23,25	<b>parking</b>	<b>patted</b>	54:4,5,6
<b>painful</b>	128:24	132:18	59:7
91:14	<b>part</b> 14:7,	<b>patting</b>	61:12,18,
<b>pair</b> 95:12	15,20	164:16	20,22
<b>pandemic</b>	31:19 58:9	<b>pause</b> 105:7	62:8,11
32:12 34:7	62:20	<b>pay</b> 33:20	64:7 71:20
149:2	89:16 90:1	35:9	75:6,10,15
<b>panel</b> 27:17	111:6	140:25	78:3 84:20
28:11	114:16	141:2	96:13
<b>pant</b> 69:1	163:7	150:16	100:22,23
<b>pants</b> 55:5	175:4	<b>paycheck</b>	114:8,17
68:21,25	180:13	41:10 46:1	116:14,16
<b>paper</b> 160:6,	<b>participate</b>	<b>paying</b>	117:6
11 188:17	51:17	127:18	123:8
<b>paperclip</b>	<b>participated</b>	<b>payments</b>	124:21,22
182:7	180:9	119:11,13	125:18,20
<b>paperclips</b>	<b>partner</b>	<b>Peachtree</b>	127:21
182:6	19:12	11:9	128:20
<b>papers</b>	<b>parts</b> 52:2	<b>pen</b> 68:11	130:1
182:12	90:15		135:9
			139:23
			140:8
			146:3
			150:24
			155:10

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Index: people's..point**

156:3	73:3 78:5	20 169:17	76:23
161:8	115:22	184:11	89:12
165:5	116:3,10,	<b>phones</b>	92:17
175:1	17 125:22	136:15,16,	115:5
179:14,23,	162:1	17 157:9	150:18
25 192:3	180:16	181:21	183:3
<b>people's</b>	<b>personal</b>	183:12	<b>places</b> 60:14
52:23	11:19	188:15	<b>plaintiff</b>
96:24	22:14	<b>photograph</b>	7:15 12:4
<b>pepper</b> 140:7	53:16	124:10	<b>play</b> 86:23
<b>percent</b>	75:16 81:1	<b>physician</b>	91:22
174:22	83:4 84:23	21:20	104:24
175:5	136:16	<b>pick</b> 141:17	<b>played</b> 86:25
<b>perception</b>	143:10	<b>picked</b>	<b>playing</b>
146:17,19	161:14	138:16	86:21
149:21	162:4	<b>picking</b>	130:3,4
154:25	174:17	130:14	<b>pocket</b> 68:20
<b>perfectly</b>	175:11	<b>picks</b> 104:21	<b>pockets</b>
59:24 60:3	<b>personally</b>	<b>picture</b>	68:19
<b>period</b> 16:9	75:14	176:13,15	<b>point</b> 21:21
29:3 45:22	84:16 98:8	<b>pictures</b>	22:19
84:19	134:12,16	124:18	33:19
103:4	175:10	<b>piece</b> 124:5,	36:23 40:1
145:14	176:3	15 125:8,	63:11 86:5
<b>periodically</b>	<b>phase</b> 46:10,	25	87:5 88:5,
86:24	13,14	<b>pieces</b>	8,12 90:22
<b>peripheral</b>	72:14	123:18	93:23
185:19	73:11,21	<b>Pittman</b>	102:24
<b>persistent</b>	<b>phone</b> 12:18	113:2	106:9,20
114:15	17:13,14	118:24	107:2
115:15	117:21,23	141:5	112:24
116:24	118:2	180:3	121:21
<b>person</b> 46:15	136:8,24	<b>place</b> 23:3	143:23
62:20 72:9	137:4,6,		147:18
	12,14,17,		177:24
	24 139:1		
	141:10,19,		

## LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Index: points..prior

<b>points</b>	<b>positive</b>	119:21	59:18
117:25	34:11	120:2	67:25 89:9
	56:22		95:13
<b>policies</b>	116:16	<b>practices</b>	104:20
47:14		48:4,9	106:8
<b>policy</b> 37:8,	<b>possession</b>	49:3 51:2	118:13
17 38:10	49:6	<b>predicted</b>	124:3
40:13 42:5	128:18,23	145:19	158:7
183:2	161:1	<b>preemptively</b>	<b>previous</b>
<b>polite</b> 125:1	<b>possibility</b>	39:8	69:17
	39:22	<b>preferable</b>	89:20
<b>politely</b>	<b>post</b> 23:8	55:5	<b>previously</b>
132:13	81:10	<b>preoccupy</b>	8:16 21:8
<b>politically</b>	189:23	147:4	73:25
43:25	190:8	<b>prepared</b>	74:17
<b>popping</b>	<b>posted</b> 59:15	30:22	76:10
32:15	181:20	<b>prescribe</b>	95:21 96:1
<b>port</b> 69:6	<b>posts</b>	143:3,7	97:7 100:5
77:5	113:12,15	<b>present</b> 7:11	<b>primarily</b>
<b>ports</b> 76:5,	<b>potential</b>	56:17	73:21
22	37:20	121:1	144:11
<b>position</b>	38:13 47:5	134:16	170:11
14:9 24:18	<b>potentially</b>	164:5	<b>prior</b> 10:21
39:15	42:14	174:14	12:3 15:7
40:14	44:16	<b>presented</b>	20:24
42:10,12	62:18	172:7,12	27:9,11
55:14	115:25	<b>presenting</b>	29:23
79:10,15	116:1	18:4	42:21 43:3
92:14	<b>poverty</b>	<b>presentment</b>	55:14
147:11	112:17	173:1	57:20
155:13	<b>power</b> 44:24	<b>pressure</b>	69:11,13
<b>positioned</b>	56:2	148:3	71:16
87:21	<b>practice</b>	<b>pretty</b> 37:16	85:5,16
<b>positions</b>	17:7	55:25 57:4	92:7 95:24
55:17	19:10,14		164:8
			169:6

## LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Index: priority..psychiatrist

<b>priority</b>	168:6	<b>professor</b>	<b>protect</b>
76:13		14:10 17:9	41:9,10
	<b>privileged</b>		80:3
<b>prison</b> 51:19	79:13	<b>profoundly</b>	
53:24	112:4	54:10	<b>protected</b>
58:3,11	128:20		78:20
60:17	131:5,8,	<b>program</b>	79:3,16,19
67:16	17,19,21	14:4,5	
71:15	132:2,5	24:15,19	<b>protective</b>
73:25	136:9	28:7 42:18	56:25
76:11,16	137:3	43:22 44:2	133:3,17,
81:11,22		45:11,25	20
82:10 84:6	<b>problems</b>	148:21	<b>protocol</b>
96:5,14,23	145:2		183:20,22
98:2,22	<b>procedure</b>	<b>programs</b>	
99:7	169:24	44:5	<b>protocols</b>
100:2,23		<b>progressed</b>	98:10
101:15,20,	<b>procedures</b>	142:14	
23 102:3	98:10	<b>prolonged</b>	<b>provide</b>
109:13	<b>proceedings</b>	177:18	16:16
128:19	37:21	178:5	22:12
133:13			25:10 29:1
135:3,4,9	<b>process</b>	<b>prom</b> 64:13,	31:12
141:17	149:23	18	124:10
160:1	166:7		
	<b>produced</b>	<b>promise</b>	<b>provided</b>
	109:20	120:7	67:13
<b>prison's</b>			95:22
97:5 98:15	<b>professional</b>	<b>prompted</b>	
	19:19 34:4	83:24	<b>provider</b>
<b>prisons</b>	45:18 56:9	108:25	142:22
54:25	60:5		
57:21	61:20,22	<b>proper</b> 45:9	<b>providers</b>
	62:20	145:25	46:25
<b>private</b>	81:11	<b>prosecuting</b>	<b>providing</b>
19:13,16	117:7	170:12	25:9
28:13			100:17
	151:4	<b>prosecution</b>	
<b>privilege</b>		34:16	<b>psychiatrist</b>
71:1 77:23		145:24	28:16,20
78:20 79:5	<b>professionally</b>	146:1	29:11 30:5
112:1	125:12	149:16	143:8,9,

## LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Index: psychological..recall

13,19	put 22:6	questions	read 51:3
psychological	36:18,21	13:6 64:6	60:21,23
20:2	59:7 62:13	140:7,8	85:22
	73:7,8	142:9	90:11
psychologist	89:12 94:1	151:8	123:7
20:1	96:4	156:9,20	155:16
PTSD	109:13	163:18,20,	readily
144:17,21	119:22	24 165:17	91:10
	120:3,14	173:5	
PTSD-TYPE	133:8	176:8	real 64:17
147:17	144:14,18	192:5,7	121:25
public 36:13	162:25		123:1
37:7 40:3	179:4,7	quick 121:25	
41:17,18,		123:1,2	reality
21 44:13	putting		146:18
55:16	82:25 88:7	quicker	realize
115:16	106:3	118:25	172:18
141:9	120:5	quotation	realized
		163:1,2,3	147:10
published			170:23
113:11	Q	R	
pull 68:22	quantities		reason 8:24
85:19	155:11	raise 154:7	9:3 12:12
			38:23 59:8
pulled 37:2	quarters	raises	64:17
72:6,7	74:16	108:15	118:18
110:24	question	ramifications	119:22
139:8	8:25 9:2	21:7 145:2	175:22
140:1	41:22	random 25:23	176:2
180:24	72:15,21	26:18	
purpose 35:5	88:14	52:23	reasonable
	108:25		80:5
purposes	123:2	rape 63:8	reasons
58:8	133:7	rapist 62:24	113:3
144:19	168:7	rapport	114:12
pursuant	175:20	183:14	143:11
133:3,17	184:23		155:20
pursue 39:21	190:22	rate 30:3	recall 29:20
		react 171:11	92:23,25

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Index: recalling..relevant**

104:15	84:3 87:4	129:23	75:23
108:12	107:11,20	134:23	111:15
119:19	<b>recommendation</b>	135:1,4	118:13
153:1,23	15:16	176:1,4	<b>rehire</b> 37:19
157:17	<b>recommended</b>	187:23	38:13
<b>recalling</b>	143:8,17	<b>recordings</b>	39:18
111:1	<b>record</b> 7:12	110:1	<b>rehired</b>
<b>receive</b>	9:18 28:17	176:6	38:13,21
18:18 49:8	37:23,25	<b>records</b>	<b>reinforced</b>
55:8 66:13	38:7 66:20	47:1,2,3	149:22
70:2	67:2 69:25	48:12	<b>reiterate</b>
160:20	70:18,19,	49:19 51:4	88:21
<b>received</b>	22 86:7,9,	144:19	<b>relate</b> 169:1
13:20	11,18	145:11	<b>related</b>
15:6,8	121:24	173:23	102:18
16:2 17:11	122:3,11	174:4,7	176:6
28:5,18	133:19,25	<b>reduces</b>	<b>relation</b>
31:5 38:16	134:3,10	56:18	110:1
55:19	151:16,23	<b>refer</b> 162:22	157:5
66:10	165:19	<b>referencing</b>	<b>relations</b>
133:3,16	167:19	135:15	43:2
175:14	168:1,3	<b>referred</b>	<b>relationship</b>
179:6,8,9	186:7,14	77:24	32:18
188:17	190:11	<b>referring</b>	183:14
<b>receiving</b>	192:10	83:16	<b>relationships</b>
123:4	<b>recorded</b>	<b>refused</b>	54:6
188:16	85:4	171:25	<b>relatives</b>
<b>recess</b> 38:3	154:22	<b>regard</b> 39:22	114:13
66:23	155:1,15,	76:1 170:1	<b>relayed</b>
86:14	22 184:16	175:19	169:17
122:6	187:4	<b>regular</b> 50:6	<b>released</b>
134:6	<b>recording</b>	96:4	137:17
151:19	77:13	<b>regularly</b>	<b>relevant</b>
167:22	109:20	54:14	
186:10	110:6,16		
<b>recollection</b>	111:2		

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Index: relieve..responsible**

26:4 29:2	137:7	22 103:9	<b>represent</b>
<b>relieve</b>	140:17		36:15
153:8	143:1	<b>removing</b>	156:10
	147:6	103:17	164:3
<b>remainder</b>	148:5,11,	104:22	166:1
18:15	17 152:19,	<b>renew</b> 21:10,	173:9
<b>remember</b>	24 153:4,	12,15 22:2	176:21
27:19	5,12,13,	<b>renewal</b>	<b>represented</b>
49:15	17,20	21:13	71:17
50:18 52:8	158:5	<b>renewed</b>	<b>representing</b>
53:1 58:15	161:20	22:22	7:15,23
59:22 60:1	162:24	<b>renting</b>	71:20,23,
64:11,15	163:9	10:9,16	25 132:15
68:13	164:13,14,	<b>rep</b> 141:8	187:2
83:24	18,20	<b>rephrase</b>	<b>requests</b>
88:24	165:4,11,	80:21	47:2
89:5,13	13 166:13	<b>replaced</b>	<b>require</b>
90:9,13,16	170:13,15	180:17	110:22
91:12,16	171:7	<b>replay</b> 91:9	<b>requirements</b>
93:2 94:10	175:18	104:3	15:15
95:12,16	177:18,23	<b>report</b> 70:2	<b>research</b>
103:6	179:5,6,24	<b>reported</b>	14:9,11
107:15,17	182:4,7	48:2	<b>reserve</b> 9:12
108:20,22,	184:13,23,	<b>reporter</b>	<b>resolved</b>
24,25	25 185:3,	7:13 8:19	162:20
114:2,14	5,12	37:22 86:8	<b>respectful</b>
115:3,16	186:21,22	96:10	125:1
118:3	188:9,16,	122:13,20	<b>responding</b>
119:16,17	25 189:1,	165:24	115:7
120:5,16,	3,11,12,13	190:17,22,	<b>responses</b>
18 123:4	<b>remind</b> 45:14	24	145:6
126:24	<b>remotely</b>	<b>reports</b>	<b>responsible</b>
127:1,8,	94:14	69:17 96:1	170:12
10,14	118:3	175:14	
128:5	149:6		
130:13	<b>remove</b> 91:23		
132:17,19	93:10,15,		
135:24			

## LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Index: responsiveness..room

<b>responsiveness</b>	175:7,8	177:8,17,	100:21
9:13		19 182:22	101:11,13
<b>restate</b> 9:4	<b>reviewing</b>	185:9	102:4
101:6	109:6	191:13	
<b>restaurant</b>	<b>revisiting</b>		<b>risks</b> 51:19
14:8,14	40:11	<b>Ricky's</b>	100:3
29:25 31:6	<b>Richey</b> 7:20	83:23	101:2
32:15,19,	156:10	111:7	<b>role</b> 45:24
25 33:10	<b>Ricky</b> 57:11	113:3	47:16
34:24 35:5	58:5	114:2	175:23
<b>restricted</b>	59:14,19	125:21	176:3
182:20,23	67:6	132:14	
<b>result</b> 20:5	71:13,23,	147:25	<b>roll</b> 68:22,
100:22	25 72:13	177:13	25 105:15
102:6	74:22 76:6	187:24	<b>rolling</b>
142:18	80:1,22	<b>right-hand</b>	106:2
145:3	83:1,8	103:17	107:6,13
159:1	84:18	<b>rightfully</b>	<b>room</b> 41:13
<b>retain</b>	85:1,6	115:24	57:7 59:19
122:17	89:2 97:17	<b>rights</b> 55:15	77:6,8,10
128:23	98:3	70:24	80:16,22
<b>retaining</b>	101:12	<b>Riley</b> 7:21	85:13
128:18	109:21	152:3,4	91:18
<b>return</b> 29:16	110:1,7,9,	<b>ring</b>	100:8
30:20,22,	17 111:2	123:12,15,	131:4
24 31:1,14	112:12	24 125:7,	134:23
<b>returned</b>	114:6,24	11,21,24	135:2
137:22	117:10,14	126:1,9	148:21
<b>returns</b> 29:2	123:5,16,	159:25	152:9,15,
<b>review</b> 28:17	21,23,24	164:24	17 154:5
83:25	124:14,21	192:1	156:20
133:10	126:17	<b>ripping</b>	157:11,15
<b>reviewed</b>	128:21	147:1	158:2,6,8,
132:23	130:7,12	<b>risk</b> 53:16,	11,20
	131:11,17	19 59:2	159:6
	132:10	69:11	163:20,21
	134:12		171:2
	163:13		176:5



## LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Index: rotated..sense

184:4,7,12	60:23 81:1	<b>school</b>	51:19
185:3,7	<b>sally</b> 69:6	13:11,12,	53:2,16
186:24	76:5,21	13,16,25	57:4 60:23
<b>rotated</b>	77:5	14:10	67:22 68:8
118:12	<b>salutation</b>	64:13,14	69:3 74:22
<b>rotating</b>	163:6,7	148:14	76:11,15,
26:13	<b>Samuel</b>	<b>scoot</b> 102:14	22,23
<b>roughly</b>	138:25	109:3	81:10,12,
18:12	167:11	<b>screen</b> 86:1,	21 82:5,11
191:8	168:12,16,	3	96:13 99:7
<b>round</b> 185:11	18 169:1,	<b>scrutiny</b>	100:3
<b>row</b> 58:22	4,5	75:1	107:1
<b>Rowe</b> 187:24	<b>Samuels</b>	<b>search</b>	110:22
<b>rules</b> 8:18	168:20	133:11,15	127:22
130:5	<b>sat</b> 157:13	137:1,5,	150:2
<b>run</b> 54:16	<b>Saturday</b>	13,23	152:14
127:2	9:24 10:2	<b>searched</b>	153:2,3,
178:3	<b>scanner</b> 68:4	128:25	17,18,24
<b>running</b>	<b>scare</b> 131:3	130:8	154:3,12,
82:25	<b>scared</b> 44:15	132:21	17,20
	56:10	134:13	155:19,20
<hr/>	129:25	135:19	<b>seek</b> 174:19
<b>s</b>	130:10	136:7	<b>selection</b>
<b>safe</b> 40:16	<b>scary</b> 33:8	<b>seating</b>	11:16
57:14	146:24	172:14	<b>send</b> 21:19
60:14	149:23	<b>seconds</b>	23:5 47:2
75:5,25	150:10,17	105:15	124:18
76:8	<b>scenarios</b>	127:12	<b>senior</b>
147:13	57:22	<b>secretive</b>	13:14,16
162:12	<b>schedule</b>	41:15	<b>sense</b> 9:7
<b>safer</b> 76:2	126:21	<b>secure</b> 74:21	19:19
<b>safety</b>	<b>scheduling</b>	75:21 76:4	34:23
52:21,23	53:11	<b>security</b>	42:7,8,11
53:16		33:22	55:11
			75:17
			107:19

## LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Index: sentence..side

114:22	140:16	shared	190:3	91:20,24
171:9	170:19	shawn	28:21	93:10,23
sentence	185:6	Shayla		94:2,7,8,
54:13	setting	180:23		13 95:10,
74:11	60:8,12			17 103:9
sentences	76:16	She'd	39:6	short 110:6
54:16	81:20	She'll	91:5	show 68:19,
sentencing	85:10	sheriff		23,25 86:4
73:12	171:12	136:4		89:10 91:7
separate	settings	sheriff's		102:12
46:14	50:12	129:3,7,		107:12,22
58:18	60:14	10,11,12,		108:18
160:16	seven-ish	14 130:20		109:15
September	179:20	139:9		122:22
9:21 21:14	sex 52:15,	sheriffs		149:20
84:1,25	16 64:19	138:15		170:24
85:5 86:22	sexuality	shifts 33:10		showed
152:11	52:12,15	34:1		22:21,25
153:1,16	shackled	shirt		67:20
181:6	140:14	130:15,17		112:24
served 35:4,	shadowing	shock 149:18		showing
5	49:18	172:22		91:15 92:8
server 14:8	shady 149:23	shocked		108:16
session	166:8	128:5		shown 116:11
144:15	167:8	129:24		155:16
sessions	169:3	shocking		175:2
17:14 50:4	170:8	90:12		shut 149:4
set 50:2	shakedown	shoe 88:22		171:15
77:2 85:16	83:22	94:7 95:11		sic 67:5
115:4	shanks	104:5		86:22
117:21	101:8,9	shoes 55:3,		side 17:2
118:10,11,	share 85:25	12,20		103:18
23 119:7	86:3	68:24		107:6
121:2	161:24,25	88:21		116:7
				156:23

## LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Index: sight..source

157:15	92:14	162:12	61:8,10
159:2,13,	97:18		64:3,6
18	102:1	<b>smiley</b>	65:1 90:11
<b>sight</b> 107:23	120:23	123:12	
<b>sign</b> 188:13	153:12	126:4	<b>sock</b> 94:2
<b>signed</b> 68:4	154:3	<b>smiling</b>	103:17
<b>significance</b>	156:23	92:1,15	104:5,21,
125:8	158:6,23	<b>SMP</b> 67:5,7	22 105:21
<b>significant</b>	159:18,20	<b>SMU</b> 57:23	106:2,6
51:9	185:9	58:18,21,	107:6,13
101:19	<b>situated</b>	25 67:8,11	108:9
150:20	157:4	68:5 76:13	<b>socks</b> 69:2
<b>significantly</b>	<b>situation</b>	81:16,19	88:20
48:18	63:2 71:13	82:5 175:1	91:18,24
108:5	75:18	178:21,22	93:10,23
<b>signs</b> 181:20	146:14	182:2	103:9
188:10	150:6	183:2,21	106:3
<b>silos</b> 73:16	187:23	184:15,19	109:7
<b>similar</b>	<b>sizeable</b>	186:25	<b>sole</b> 28:2
19:25	65:2	187:3,8,9,	<b>solely</b> 24:24
24:18,20	<b>skills</b>	20 188:4	<b>some-</b> 162:13
<b>single</b> 130:8	112:15	<b>sneakers</b>	<b>someone's</b>
<b>sister</b> 11:6,	149:1	56:7	53:7 55:21
7,12	<b>sleep</b> 13:5	<b>so-and-so</b>	56:6 119:2
111:18	<b>slide</b> 91:19,	64:12	<b>something's</b>
116:6	20	119:1	57:14
<b>sit</b> 130:21	<b>slow</b> 54:11	163:15	<b>sophisticated</b>
131:10	<b>slower</b> 54:12	<b>social</b> 14:2,	124:5
154:13	<b>small</b> 25:4	5,10 15:6,	<b>sort</b> 87:20
171:23	29:13	7,13,14,21	152:14
<b>sitting</b>	36:14	16:15,17	156:2
56:12	57:3,21	17:1,9	<b>Sounds</b> 66:18
57:10	181:24	19:10,24	<b>source</b>
<b>smart</b> 33:14	<b>smart</b> 33:14	20:2 34:5,	114:9,11
		12,24	
		36:19	
		45:18,19	

## LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Index: Southern..staticky

<b>Southern</b>	52:1 55:25	<b>staffed</b>	25:5	71:12
55:15	<b>specific</b>	<b>stand</b>	127:12	72:10 73:6
<b>Southwest</b>	45:24 76:1	140:1		88:25
10:4	82:23	<b>standalone</b>		89:17
<b>space</b> 98:14	161:4,13	68:8 76:22		91:15
<b>speak</b> 8:21	<b>specifically</b>	127:22		147:2,5,17
46:12,14	40:12 55:2	<b>standard</b>		148:5
113:8	95:12	95:4		149:8
114:21	104:17	109:17		177:22
123:22	164:20	125:8		178:25
180:10	165:13	127:2		179:2
<b>speaker</b> 52:6	166:11	183:20,22		181:5
<b>speaking</b>	170:2	<b>standards</b>		183:9
156:22	<b>specifics</b>	78:18	<b>starter</b>	188:3
<b>special</b>	166:9	<b>standing</b>	48:12	
137:11	<b>spell</b> 17:5	20:22,25	<b>state</b> 9:17	
177:1	<b>spend</b> 46:24	21:5	13:19	
178:21	112:20	127:10,14,	14:1,4,23	
<b>specialist</b>	<b>spent</b> 34:3	20	24:19 28:7	
24:21 25:5	114:6,9,12	<b>staple</b>	37:9 42:22	
26:12	<b>spoke</b> 168:3	182:11,12	43:16	
29:9,12	<b>spoken</b> 78:5	<b>staples</b>	45:10,25	
30:6 46:6,	174:12	181:23	52:2 58:3,	
9,17 47:20	<b>sports</b> 14:18	<b>staring</b>	23 71:19,	
71:24	<b>spring</b> 22:5,	185:18	20 111:7	
73:20	19	<b>start</b> 13:10	135:9	
147:12,24	<b>squarely</b>	23:15	<b>state-issued</b>	
148:2	87:21	24:12 35:3	91:18	
180:11,16	<b>stable</b>	<b>started</b>	<b>statement</b>	
183:15	114:23	33:15	103:14	
<b>specialist/</b>	149:8	35:13 44:4	138:12	
<b>mitigation</b>	<b>staff</b> 16:17	45:9,10,12	167:7	
46:3	80:3	49:4,25	169:23	
<b>specialists</b>		54:24	<b>states</b> 79:2	
28:14 48:1			<b>staticky</b>	

## LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Index: station..supervisor

183:12	65:2,8,10, 16,24	stuck 69:1,2	147:10,21 150:1
station		studies	
141:25	strange	23:17 58:9	suffered
status 22:3,	140:23	60:5,9	102:21
6,8 23:4	strategic	stuff 15:25	Sullivan
37:19	89:25	24:5 79:7	29:10
38:13	stress 119:3	83:23	summer 40:19
42:13		109:24	58:11,12
stay 36:25	stress- relieving	174:4	149:7
37:13 45:3	34:19	180:8	
step 128:4	stressed	182:1	Sunday 33:17
Stephanie	164:19	183:8	super 56:8
26:22	stressful	subject 85:4	supercedes
stipend	146:1	submit 39:14	21:2
14:13	strict 75:1	submitted	superior
stipulations	181:23	25:17	65:5
9:11	182:3	subsequent	supervise
stop 86:24	strike 71:9	16:10	17:18 48:3
87:25	84:24	18:19	supervised
104:3	98:25	20:15	15:22
105:2	184:1	109:19	supervisees
177:13	strip 130:8	121:8	17:22
stopped	132:21	138:22	supervising
64:16	133:11,15	subsequently	17:25
87:19	134:13	142:1	supervision
115:7	strong 48:19	substance	15:24
stories	114:11	26:3	16:10,11,
89:23	structure	subtract	16,18,23
162:4	44:24	31:8	17:2,11,
178:3	54:13	successful	15,21
story 27:25	struggled	48:6,7	19:21
30:21	147:20	sudden 42:3	49:25
63:22,23	167:3	suddenly	50:10
64:22,24		33:24	supervisor

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Index: supplemental..tattoo**

26:21	<b>sworn</b> 8:7	105:22	125:18
<b>supplemental</b>	<b>symptoms</b>	106:6	128:11,12
22:13	51:10	107:9,13	129:17
<b>support</b>	144:17	<b>talk</b> 18:1,2	134:21
79:10	147:17	49:21	135:10
80:13	<b>syndrome</b>	50:2,3	139:3
<b>supports</b>	50:19	52:4,10,	142:13
79:15	<b>system</b> 62:9,	11,21	<b>talking</b>
<b>supposed</b>	12	53:10	52:14
47:20	<b>Szatkowski</b>	54:11	64:8,16
105:14	180:5,12	56:20	65:9,19
118:14,15,		57:20	66:1 78:11
16,21	<hr/> <b>T</b> <hr/>	64:21	87:15
129:25		89:7,9,21,	89:18
130:2,6	<b>table</b> 9:1	25 90:3,5	90:14,15
146:13	88:4,7,12	94:9,13	91:5
158:19	92:24	114:7	107:17,18
183:15	93:4,18,	125:20	108:25
<b>surely</b>	19,25	130:21	112:7,18
172:18	94:6,12	131:11,13,	123:15
<b>surface</b>	96:5 97:3	15,20	130:17
106:16	100:7,9	132:4,10,	131:14,22
107:24	102:24,25	13 135:14,	132:5,19
<b>surmise</b> 79:9	103:2	17 141:24	139:23
<b>surprised</b>	104:13	152:9	148:14
169:7,16	106:9,10,	155:9	155:21,24
<b>surveillance</b>	16,22	170:20,24,	158:8
81:21	107:23,25	25 171:14	162:5
<b>suspended</b>	108:7	188:2	164:14,18
21:7	109:14	<b>talked</b> 37:11	167:11
<b>suspicion</b>	130:16	39:1 45:22	171:25
126:12	156:24	52:16	177:22,25
<b>swear</b> 7:13	<b>tables</b> 34:4	61:15 67:4	<b>targeted</b>
	<b>takes</b> 146:4	83:10 89:3	146:19
	<b>taking</b> 9:1	90:17	<b>tasked</b> 73:10
	14:19	112:15	<b>tattoo</b> 91:14
		120:20	109:2

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Index: tattoos..texts**

tattoos	155:10	tells	65:24	170:9	
88:17	156:15			172:4	
89:18,21	161:7,8	temporary			
90:14,15,	162:11	43:17		terrified	
23 91:11,	165:2	ten	30:17,	147:8	
13 92:8	173:24	18 105:8,		terrifying	
104:10	177:13,20	13,14,15		146:16	
107:18	179:15,16,	ten-second-		149:15	
108:17,18,	22,25	back	105:3	test	18:20
21 165:8	180:7,13,	tend	8:20	testified	
taught	61:19			95:21	
tax	29:2	terminate		159:24	
	24 184:22	150:12		164:4	
teachers	186:19	terminated		testify	13:2
46:25	187:3,17,	33:24		testimony	
148:14	22,25	34:22		25:9,10	
teaching	191:20,24,	35:22,24		82:17	
148:25	25	37:2,10		134:22	
team	50:6,8	38:11 40:9		164:24	
	team's	42:3,16		173:9	
57:17	70:25	45:23		178:15	
62:1,21	teams			189:5	
67:18 68:2	60:22	terminology		testing	20:2
69:25	100:16	139:10		47:9 50:12	
73:14,15	117:1	terms	23:6	tests	16:4,5
77:25 78:4	136:21	25:8 35:7		Texas	
84:21	186:23	47:15		111:12,14,	
96:19,24	telehealth	52:25		15 114:3,	
97:20	17:16,19,	53:15 66:4		14,19	
98:16,17	20	79:21		115:13	
100:12	telephone	81:12		189:12	
113:4	111:3	91:11 96:3		text	118:1
118:11,13	117:19,20	134:20		123:1	
124:19,21	182:21	136:24		136:20	
136:17,20	183:1	142:12		texts	115:8
140:1	telling	149:8,10			
141:6,16	87:9	152:23			
146:20	131:12	168:11			
	162:8				
	178:2				

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Index: thankful..timeframes**

<b>thankful</b>	165:5	<b>tie</b>	176:14	22 87:6,16
191:20	175:17	<b>tied</b>	137:15	88:5 89:4
<b>themes</b> 46:9	177:14	<b>Tifton</b>	71:22	93:23
<b>theories</b>	181:11,23	<b>tight</b>	50:21	94:18
46:10	182:12	<b>time</b>	7:10	100:18,19,
<b>therapist</b>	185:11			20 103:4
19:13,16	188:7	8:22 12:18		111:13
52:15,16	<b>thinking</b>	14:7,15,		112:20
<b>therapy</b>	50:3 90:10	20,21 16:9		114:7,10,
15:20	98:21,22	29:2		12 115:4,
19:11	114:1	30:11,14		12 118:1
144:2	137:7	31:19		120:6
<b>thing</b> 50:6	146:7	32:12,15,		121:1
51:6 85:24	148:11	23,24 33:7		122:2,10
102:13	187:12	34:7,16,		133:11
105:4	<b>thought</b> 33:9	21,25		134:2,9
137:13	36:19	36:5,7,8		145:15,17
139:12	41:20	37:24		146:23
140:6	47:10	38:6,15		149:2
<b>things</b> 27:17	63:21 72:4	39:2 41:11		151:15,22
34:9,19	75:21	45:22		161:19
41:3,11,25	78:12	46:24		165:13
48:15,20	82:14	47:25		166:22
56:1 61:15	97:11	49:24		167:18,25
65:3 68:10	113:18	50:18		171:4
76:7 89:7	127:25	51:25		172:6,21
94:14	129:25	52:10		176:18,19
95:20	131:6	57:10 58:6		177:1,19
101:7	143:9	64:19,23		178:25
117:6	146:22	65:6,18		179:2,16
153:10	172:17	66:19		186:6,13,
155:9	176:19	67:1,7		18 187:1,
160:8,10,	<b>throwing</b>	68:1 70:1		20 192:9
21 161:10,	55:21	72:23	<b>timeframe</b>	
18,20	<b>Thursday</b>	77:19	30:9 35:11	
162:2,7,19	10:10	80:18	37:3	
		84:18	<b>timeframes</b>	
		86:10,17,		



**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023****Index: timeline..truthfully**

35:7	38:22 39:3	<b>touch</b> 8:15	181:15
<b>timeline</b>	40:21,24	<b>toured</b>	183:8
45:9	41:12 42:6	58:12,22	<b>trainings</b>
<b>times</b> 32:15,	64:22	<b>town</b> 57:3,	50:25
21 50:2	79:11	21 129:4	52:19
61:9 67:17	125:15	181:24	<b>trajectory</b>
68:1 75:3	128:7	<b>track</b> 81:24	87:14
111:8	130:11	<b>traffic</b>	<b>transcript</b>
126:7	140:10,21,	12:14	8:23
130:19	22,23,25	159:19	<b>transfer</b>
132:12	144:14	<b>trailer</b> 56:6	40:24
137:2	166:14	<b>train</b> 52:6	<b>transferred</b>
139:4	169:12	150:22	13:19
144:11	170:21	151:1	36:12,17
177:5,11	<b>Tomeika</b> 8:2	<b>trained</b>	<b>trauma</b> 26:6
181:1,3,4	173:9,12,	46:18	<b>travel</b> 52:3
183:6	14	61:24	<b>treating</b>
184:9	<b>tomorrow</b>	114:17	142:19,20
185:19	115:9	<b>training</b>	<b>trial</b> 25:6
<b>timing</b>	141:24	19:20	46:14
172:5,8	<b>tons</b> 136:20	20:15	72:19,22
<b>tips</b> 31:23	<b>top</b> 32:8	23:7,8,11,	179:18
32:8	56:8 57:9	15 24:1,3,	180:9,25
<b>tired</b> 67:10	<b>topic</b> 52:24	8 26:8	<b>trials</b> 46:12
<b>title</b> 45:25	65:10	48:13	<b>trip</b> 111:21
<b>today</b> 12:19	171:21	49:8,11	114:19,21
13:1 83:4	<b>topics</b> 50:25	50:10,17,	123:10,11
102:1	52:7 65:9	18 51:5,9,	<b>trips</b> 111:11
118:21,22	<b>total</b> 18:9	14,15,18	<b>true</b> 67:24
120:23	178:24	53:15	<b>trust</b> 41:3
<b>Today's</b> 7:9	179:14	54:1,3,8,	<b>truthfully</b>
<b>token</b> 125:5	<b>totally</b>	17 55:9	13:2,7
<b>told</b> 36:22	93:24	61:14	
37:5,7,12	102:14	81:9,11	
	187:12	138:7	

## LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Index: Tucker..utilized

<b>Tucker</b> 9:23	59:13	<b>underground</b>	161:6
<b>tuition</b>	72:20 88:2	123:22	171:6
14:12	90:21	<b>underlying</b>	<b>understood</b>
<b>turn</b> 65:2	92:3,22	73:12	9:5 154:9,
68:19	93:6,20	<b>understand</b>	16
146:15	95:23 99:5	9:2 13:6	<b>uniform</b>
158:22	104:19	23:3 44:4	47:17
<b>turned</b> 7:4	106:3,7	54:15	<b>unit</b> 25:3,6
38:2,5	107:8	62:25	177:2
66:22,25	108:11	72:15	178:21
86:13,16	113:13,17	77:21,23	<b>university</b>
122:5,8	118:6	80:5 116:8	13:15,19
134:5,8	123:14	117:1	14:1 15:2
151:18,21	126:3,19	145:22	<b>unlock</b>
167:21,24	155:25	146:17	127:13,18
185:25	163:5	149:19	<b>unpleasant</b>
186:9,12	<b>ultimately</b>	152:13	178:11
192:12	54:21	167:3	<b>unsafe</b> 40:6
<b>twisting</b>	136:23	173:14,16	57:18,19
92:13	137:23	<b>understanding</b>	147:22
<b>type</b> 22:3	142:4	39:11	<b>unusual</b>
70:5	<b>uncles</b> 11:21	48:20 59:9	94:11,14
<b>types</b> 23:7	114:8	67:6 71:8	109:16
188:6	<b>uncomfortable</b>	77:18,22	125:13,14
	41:16	78:16	166:24
	52:14	79:25	<b>upset</b> 171:2
<b>U</b>	<b>uncommon</b>	80:17	<b>utilize</b>
<b>UGA</b> 17:9	124:17	83:19,20	117:23,24
<b>Uh-huh</b> 16:8	154:12	88:19	120:11
17:17 27:3	<b>uncovering</b>	96:12	<b>utilized</b>
29:17	64:25	99:23	122:18
30:25 33:4	112:19	110:9	128:19
35:20 46:7	<b>under-</b> 87:13	113:20	
49:5,12	<b>undergrad</b>	118:4	
51:21	58:10	123:20	
57:25		124:14	
		145:25	

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.****Lily Engleman on 02/14/2023 V-I-S-H-W-A-M-I-T-R-..voluntarily**

	66:21,24	91:10	110:13
<b>V</b>	83:25	106:15,23	117:11
	85:23	107:2	157:9
<b>V-I-S-H-W-A-M-I-T-R-A</b> 49:1	86:12,15,	152:22	158:24
	21,25	158:7	185:3,7
<b>vague</b> 63:25	90:7,9	<b>visit</b> 12:19	186:24
<b>Valentine's</b>	102:13,14	46:23	<b>visited</b> 58:5
35:17	103:21,22	67:16	165:5
<b>variety</b> 20:4	109:4,6	74:25	184:9
50:25	111:1	77:3,20	<b>visiting</b>
113:12	122:4,7,17	78:8 80:7,	85:7
<b>vary</b> 30:3	130:11	11 83:25	177:19
57:4	131:23	84:25	178:15,20
<b>vehicle</b>	134:4,7,22	85:1,4,15	183:10
128:25	135:2,3,7	86:21	<b>visitors</b>
129:1	149:19	87:14,17	60:7,22
136:7	151:17,20	88:24	80:3
141:18	156:22	89:1,2,4,	<b>visits</b> 49:17
<b>verbal</b> 69:14	157:14	8,14 90:13	53:11
78:19	167:20,23	96:5	67:23 83:1
79:2,15,18	170:18,21,	109:12	84:18,20
131:24	24 171:24	123:10	85:5,16
189:1	174:21,22	126:15,17,	89:20 94:7
<b>verbally</b>	175:2	20,25	126:21
77:14	186:8,11,	127:2	129:24
<b>verify</b> 107:1	16,20	130:8	156:16,20
<b>versus</b> 7:8	192:11	132:22	182:14,16,
135:9	<b>videos</b>	134:13	21 183:4,
<b>veteran</b>	134:20	135:5	6,10,18,23
51:3,4	<b>view</b> 87:22	154:11	184:3
<b>Victoria</b>	<b>views</b> 157:9	155:15,22	188:8,12,
11:13	<b>violence</b>	177:8	20
<b>video</b> 7:3	60:11	181:3,8,	<b>Vivia</b> 180:22
38:1,4	<b>Vishwamitra</b>	12,16	<b>voice</b> 109:19
	49:1	184:12,14	<b>voluntarily</b>
	<b>visible</b>	<b>visitation</b>	
		77:6,8,10	

## LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Index: W-2..wondering

147:14	walls 152:17	130:11	wepers 188:15
<hr/>	wanted 8:15	watching	
W	19:11,12,	90:6	whatsoever 21:22
<hr/>	20 21:19	129:24	
W-2 31:5	28:17	ways 54:4	Wi-fi 110:21
waist 140:14	37:15	129:4	widely 57:4
wait 77:1	64:21	weapons 24:8	window 57:9
129:1,7	65:21,22	181:22	159:7,9
140:12	89:15 94:8	188:15	windows 156:25
177:8	95:15	189:2	157:5,8
waiting 34:3	110:12		158:11
177:15,21	114:21	wear 55:11,	159:2
waive 167:15	125:3,4	20 95:14	
waiver 168:5	131:15,25	wearing 56:7	Wing 14:16
wake	135:14,16	68:21	29:24
146:10,12	170:23	94:17	31:20
walk 46:5	171:14,23	95:19	147:3
77:4 94:24	wanting 56:1	week 30:13,	Winne 140:5,
126:16	65:2 114:7	17 33:10,	16 141:7
158:5,9	Ward 180:6	17 119:2	witnesses 132:24
177:11	warden 81:20	139:2	148:10
walked 95:8	84:3 99:7	weekly 50:24	
171:2	110:10,12	weeks 49:16	woman 53:17
walking 45:7	135:8	72:18	55:1 114:1
53:7 77:8	176:25	147:19	117:5
90:9	177:1,22	169:6,15	
158:20	warrant	172:25	women 55:6
177:10	128:8	181:9,13	60:17,21,
wall 152:20	129:22	weird 141:3	22 61:4
156:24	137:1,5,13	185:5	62:12
157:21,24	174:19	welfare	117:7
158:11	waste 171:4	43:14	164:15
185:13,14,	watch 88:25	well-being	wondering 127:15
16	171:24	150:25	
	watched		

## LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.

Lily Engleman on 02/14/2023

Index: word..years

<b>word</b> 33:2	146:14	33:17	<b>write</b> 78:8
41:22	147:5,20	34:24	160:8
124:3	148:2	40:14	161:8,17,
<b>wore</b> 34:21	150:11	42:16	18,21
68:21	181:14	44:4,14,19	162:10,13,
95:7,18	191:8	47:23 51:2	21,25
<b>work</b> 13:11	<b>worked</b> 14:7	61:5 71:12	<b>writing</b> 78:7
14:2,5,10,	28:20	72:12,16	123:10
22 15:6,8,	29:9,10,	73:6,11	162:9,10
14,19,21,	11,13,14	100:22	<b>written</b>
23 17:9	30:10 35:2	125:11	22:14
19:10	41:18,21	135:7	79:18
20:16	43:14 57:2	147:2,12,	155:7
23:12	71:20	23 149:6	161:10
24:6,12,	72:22	178:25	<b>wrote</b> 22:18,
14,22,24	75:11	179:2	22 175:15
25:9,25	79:12	<b>workplace</b>	189:19
26:10,20	113:1	67:15	
27:10	126:8	<b>works</b> 17:10	<hr/> Y <hr/>
28:13,15	146:5	102:3	
29:8 30:4,	187:7	<b>world</b> 51:7	<b>year</b> 13:14,
5 32:24	<b>worker</b> 15:13	58:11	16,17,18
33:10 35:5	16:15,17	144:12	17:3 18:22
40:6,9	19:24	<b>worried</b>	21:13,17
43:13,16	34:24	44:21	24:17
48:3 51:1	36:19	155:3	27:14
58:8 63:20	45:18,19	179:5	29:23,24
66:6 73:16	90:11	<b>worry</b> 154:14	55:15,17
81:16	<b>workers</b> 17:1	155:2	137:17
101:15,21	20:2	<b>worse</b> 89:12	142:6
111:16	<b>working</b>	<b>worst</b> 63:18	150:19
114:20	14:3,15	<b>wrapped</b>	166:21,23
117:2,11	18:2 24:12	37:14	170:16,17
124:24	27:9 28:10	<b>wraps</b> 36:23	180:25
136:18,19	29:24		<b>years</b> 10:24
137:8	30:11		15:23 16:1
142:13	31:19		21:13,14

**LILY ENGLEMAN vs NATHAN ADKERSON, ET AL.**

**Lily Engleman on 02/14/2023**

**Index: yesterday..zoom-in**

32:5 34:3  
41:19  
47:24 68:6  
85:8 94:11  
107:16  
113:5  
124:23  
177:24  
181:8

**yesterday**

110:24

**yet also**

116:14

**yielded**

139:18

**you-all 18:5**

63:22 87:5

110:3

117:11

**young 55:1**

114:1,6,25

117:5,6

**younger 11:7**

114:4

---

**Z**

---

**zoom 17:15**

18:1 50:25

85:21

123:9

155:2,5

165:16

**zoom-in**

156:2